

EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BLOCKCHAIN TECHNOLOGIES
CORPORATION,

Plaintiff /

Counterclaim Defendant,

against

RVH INC. and ROBERT HERSKOWITZ,

Defendants /

Counterclaim Plaintiffs.

Case No.

1:18-cv-

09352-AJN

RVH INC. and ROBERT HERSKOWITZ,

Third-Party Plaintiffs,

against

NIKOLAOS SPANOS a/k/a NICK SPANOS

and THE SYNAPSE FOUNDATION d/b/a

ZAP.ORG,

Third-Party Defendants.

DEPOSITION OF NIKOLAOS SPANOS

DATE: Monday, March 9, 2020

TIME: 10:28 a.m.



<p style="text-align: right;">Page 2</p> <p>1 DATE: Monday, March 9, 2020</p> <p>2 TIME: 10:28 a.m.</p> <p>3 LOCATION: Foster Garvey PC</p> <p>4 100 Wall Street, 20th Floor</p> <p>5 New York, NY 10005-3708</p> <p>6 REPORTED BY: Kenneth Katz, Notary Public</p> <p>7 JOB No.: 4019160</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p style="text-align: center;">I N D E X</p> <p>2 EXAMINATION: PAGE</p> <p>3 By Mr. Heller 7</p> <p>4</p> <p style="text-align: center;">E X H I B I T S</p> <p>6 NO. DESCRIPTION PAGE</p> <p>7 Exhibit A Zap.org Website Printout 21</p> <p>8 Exhibit B Blockchain Bill 81</p> <p>9 Exhibit C Photograph 101</p> <p>10</p> <p>11 (Exhibits retained by counsel.)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1 A P P E A R A N C E S</p> <p>2 ON BEHALF OF DEFENDANTS:</p> <p>3 ALAN HELLER, ESQUIRE</p> <p>4 Foster Garvey PC</p> <p>5 100 Wall Street, 20th Floor</p> <p>6 New York, NY 10005-3708</p> <p>7 alan.heller@foster.com</p> <p>8 (212) 965-4526</p> <p>9</p> <p>10 ON BEHALF OF NIKOLAOS SPANOS:</p> <p>11 PETER GINSBURG, ESQUIRE</p> <p>12 Sullivan & Worcester LLP</p> <p>13 1633 Broadway, 32nd Floor</p> <p>14 New York, NY 10019</p> <p>15 pginsberg@sullivanlaw.com</p> <p>16 (212) 660-3059</p> <p>17</p> <p>18</p> <p>19 ALSO PRESENT:</p> <p>20 Robert Herskowitz</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 N. SPANOS</p> <p>2 COURT REPORTER: Good morning. My name</p> <p>3 is Kenneth Katz; I am the reporter assigned by</p> <p>4 Veritext to take the record of this proceeding. I am</p> <p>5 a notary authorized to take acknowledgements and</p> <p>6 administer oaths in New York. We are now on the</p> <p>7 record.</p> <p>8 This is the deposition of Nikolaos</p> <p>9 Spanos taken in the matter of Blockchain Technologies</p> <p>10 Corporation, Plaintiff/Counterclaim Defendant against</p> <p>11 RVH Inc. and Robert Herskowitz,</p> <p>12 Defendants/Counterclaim Plaintiffs; RVH Inc. and</p> <p>13 Robert Herskowitz, Third-Party Plaintiffs against</p> <p>14 Nikolaos Spanos a/k/a Nick Spanos and The Synapse</p> <p>15 Foundation d/b/a ZAP.org, Third-Party Defendants at</p> <p>16 10:28 a.m. on Monday, March 9, 2020 at Foster Garvey</p> <p>17 PC, 100 Wall Street, 20th Floor, New York, New York</p> <p>18 10005,</p> <p>19 Absent an objection on the record</p> <p>20 before the witness is sworn, all parties and the</p> <p>21 witness understand and agree that any certified</p> <p>22 transcript produced from this recording of this</p> <p>23 proceeding:</p> <p>24 - is intended for all uses permitted</p> <p>25 under applicable procedural and</p>

2 (Pages 2 - 5)

<p style="text-align: right;">Page 6</p> <p>1 N. SPANOS</p> <p>2 evidentiary rules and laws in the same</p> <p>3 manner as a deposition recorded by</p> <p>4 stenographic means; and</p> <p>5 - shall constitute written stipulation</p> <p>6 of such.</p> <p>7 At this time will everyone in</p> <p>8 attendance or appearing remotely please identify</p> <p>9 yourself for the record, beginning from my right.</p> <p>10 THE WITNESS: Nikolaos Spanos.</p> <p>11 MR. GINSBERG: Peter R. Ginsberg.</p> <p>12 MR. HELLER: Alan Heller.</p> <p>13 COURT REPORTER: Thank you. Hearing no</p> <p>14 objection, I will now swear in the witness.</p> <p>15 WHEREUPON,</p> <p>16 NIKOLAOS SPANOS,</p> <p>17 called as a witness, and having been first duly sworn</p> <p>18 to tell the truth, the whole truth and nothing but the</p> <p>19 truth, was examined and testified as follows:</p> <p>20 COURT REPORTER: Please begin.</p> <p>21 MR. HELLER: Okay. Let's go off the</p> <p>22 record. Do you want Mr. Spanos --</p> <p>23 COURT REPORTER: Just one -- well, we</p> <p>24 have --</p> <p>25 MR. HELLER: Off the record.</p>	<p style="text-align: right;">Page 8</p> <p>1 N. SPANOS</p> <p>2 Please answer all questions with a verbal</p> <p>3 response. The court -- well now it's not a</p> <p>4 stenographer. Now it is a recording will not take a</p> <p>5 nod or a grunt. It needs a verbal response.</p> <p>6 And please, I have to assume that at various</p> <p>7 times during the deposition, you will anticipate the</p> <p>8 answer before I complete my question. But in order</p> <p>9 for me to get the record straight, I'm going to ask</p> <p>10 you to please, to the best of your ability, wait for</p> <p>11 me to finish my question before you answer it.</p> <p>12 And also I'm just -- I take this seriously.</p> <p>13 And I know this may not be taken seriously. There are</p> <p>14 certain things that are a little distracting. Please</p> <p>15 try your best to take this seriously. And Mr.</p> <p>16 Herskowitz just walked into this room. So we're just</p> <p>17 about ready to start. Off the record.</p> <p>18 COURT REPORTER: Okay. Just one</p> <p>19 second. The time now is 10:32 a.m.</p> <p>20 (Off the record.)</p> <p>21 COURT REPORTER: We're back on the</p> <p>22 record. The time now is 10:33 a.m.</p> <p>23 BY MR. HELLER:</p> <p>24 Q Okay. Mr. Spanos, are you familiar with an</p> <p>25 entity by the name of Zap.org?</p>
<p style="text-align: right;">Page 7</p> <p>1 N. SPANOS</p> <p>2 COURT REPORTER: Okay. We're going off</p> <p>3 the record. The time now is 10:29 a.m.</p> <p>4 (Off the record.)</p> <p>5 COURT REPORTER: We're back on the</p> <p>6 record. The time now is 10:30 a.m.</p> <p>7 EXAMINATION</p> <p>8 BY MR. HELLER:</p> <p>9 Q Mr. Spanos, my name is Alan Heller. I'm</p> <p>10 from the firm Foster Garvey. I represent the</p> <p>11 defendants and the counterclaim plaintiffs and third-</p> <p>12 party plaintiffs in this action.</p> <p>13 I'm going to ask you a bunch of questions in</p> <p>14 connection with the court order that was issued</p> <p>15 permitting me to take the limited deposition of you in</p> <p>16 connection with jurisdiction over Zap.org. And if you</p> <p>17 do not understand the question, please tell me that</p> <p>18 you do not understand. I do not want you to answer a</p> <p>19 question that you don't understand. And then I'll try</p> <p>20 to rephrase it.</p> <p>21 If for any reason your attorney objects to</p> <p>22 my question, please wait for him to state the</p> <p>23 objection on the record and either I or your attorney</p> <p>24 will let you know whether or not you should answer the</p> <p>25 question that is posed.</p>	<p style="text-align: right;">Page 9</p> <p>1 N. SPANOS</p> <p>2 A Entity?</p> <p>3 Q Are you familiar with Zap.org?</p> <p>4 A Yes.</p> <p>5 Q What is Zap.org?</p> <p>6 A It's a domain name.</p> <p>7 Q Who owns Zap.org, the domain name?</p> <p>8 A The foundation.</p> <p>9 Q And what's the name of the foundation?</p> <p>10 A Synapse Foundation.</p> <p>11 Q When did the Synapse Foundation begin</p> <p>12 ownership of Zap.org?</p> <p>13 MR. GINSBERG: If you know.</p> <p>14 THE WITNESS: I don't remember exactly.</p> <p>15 I don't know.</p> <p>16 BY MR. HELLER:</p> <p>17 Q Approximately? Do you know how many years</p> <p>18 ago?</p> <p>19 A I don't remember.</p> <p>20 Q Was it before or after -- are you familiar</p> <p>21 with Mr. Herskowitz?</p> <p>22 A Yeah.</p> <p>23 Q Was it before or after you met Mr.</p> <p>24 Herskowitz?</p> <p>25 A After.</p>

3 (Pages 6 - 9)

<p style="text-align: right;">Page 10</p> <p>1 N. SPANOS</p> <p>2 Q How long after you met Mr. Herskowitz did</p> <p>3 you --</p> <p>4 A Oh, I don't know. I really don't. I don't</p> <p>5 know. I don't remember exactly, you know, what year</p> <p>6 it was because it was changes. I don't remember. I</p> <p>7 don't remember.</p> <p>8 Q Who were the owners of the Synapse</p> <p>9 Foundation?</p> <p>10 A I think don't think -- I don't think there</p> <p>11 are owners. I think it's board members.</p> <p>12 Q What is your role with Zap.org?</p> <p>13 A I'm on the board.</p> <p>14 Q Do you have any other relationship with</p> <p>15 Zap.org?</p> <p>16 A No. There's no -- I'm sorry. Can I go</p> <p>17 back?</p> <p>18 MR. GINSBERG: Sure.</p> <p>19 THE WITNESS: I'm not on the board of</p> <p>20 Zap.org.</p> <p>21 BY MR. HELLER:</p> <p>22 Q You're on the board of the Synapse</p> <p>23 Foundation?</p> <p>24 A Yes.</p> <p>25 Q Who else is on the board of the Synapse</p>	<p style="text-align: right;">Page 12</p> <p>1 N. SPANOS</p> <p>2 take credit for.</p> <p>3 Q What would you take credit for? What did</p> <p>4 you do that you think -- what do you think you did in</p> <p>5 connection with Zap.org, whether or not you take</p> <p>6 credit for it?</p> <p>7 A I'd like to believe that I gave good</p> <p>8 insight.</p> <p>9 Q Has anyone ever objected to your placement</p> <p>10 of the word cofounder of Zap.org on your LinkedIn</p> <p>11 page?</p> <p>12 A I don't run my LinkedIn page. So frankly I</p> <p>13 didn't even know it was there.</p> <p>14 Q Have you ever held yourself out as a</p> <p>15 cofounder of Zap.org?</p> <p>16 A Yeah.</p> <p>17 Q Okay. Has anyone ever objected to your</p> <p>18 holding yourself out as a cofounder of Zap.org?</p> <p>19 A Do I have to answer that? There might have</p> <p>20 been a few probably maybe.</p> <p>21 Q Okay. Who objected to that?</p> <p>22 A I don't remember.</p> <p>23 Q Other than good insight, what else did you</p> <p>24 do for Zap.org when it was founded?</p> <p>25 A You know, like I was looked at as a good</p>
<p style="text-align: right;">Page 11</p> <p>1 N. SPANOS</p> <p>2 Foundation?</p> <p>3 A Iorgos Clufetos. There's a Danish guy. I</p> <p>4 don't know his name.</p> <p>5 Q You're currently --</p> <p>6 A I can't -- I don't know the name.</p> <p>7 Q -- on the board, correct?</p> <p>8 A Yeah.</p> <p>9 Q Okay. At the time the Synapse Foundation</p> <p>10 was founded, was organized, who was on the board of</p> <p>11 the Synapse Foundation?</p> <p>12 A I don't remember.</p> <p>13 Q Was there a particular individual who came</p> <p>14 up with the idea zap.org?</p> <p>15 A I don't remember.</p> <p>16 Q Did you play a role in the creation of</p> <p>17 zap.org?</p> <p>18 A I'd like to believe so.</p> <p>19 Q Okay. Let the record reflect that your</p> <p>20 LinkedIn webpage says that you're a founder of</p> <p>21 zap.org. Is that correct?</p> <p>22 A Well, cofounder maybe.</p> <p>23 Q Okay. And as a cofounder of zap.org, what</p> <p>24 did you do?</p> <p>25 A With people -- I'm not sure what I could</p>	<p style="text-align: right;">Page 13</p> <p>1 N. SPANOS</p> <p>2 resource.</p> <p>3 Q By whom?</p> <p>4 A By members of -- oh, I'm sorry. Is that</p> <p>5 okay? Members of the board and, you know, people that</p> <p>6 were involved.</p> <p>7 Q Okay. Let's start with members of the board</p> <p>8 and then people who were involved. At the time</p> <p>9 Zap.org was formed, who were the members of the board</p> <p>10 of Synapse Foundation?</p> <p>11 A I don't remember. There were -- I don't</p> <p>12 remember.</p> <p>13 Q Okay. Is there anything that would --</p> <p>14 MR. GINSBERG: Do you remember anyone?</p> <p>15 THE WITNESS: Huh?</p> <p>16 MR. GINSBERG: Do you remember anyone?</p> <p>17 THE WITNESS: I gave him names. I</p> <p>18 don't remember. What's the question again?</p> <p>19 BY MR. HELLER:</p> <p>20 Q At the time of the formation of Zap.org, who</p> <p>21 were the members of the board of the Synapse</p> <p>22 Foundation?</p> <p>23 A I gave you the names. I gave you Clufetos.</p> <p>24 I don't remember the -</p> <p>25 Q Are you able to spell the name?</p>

4 (Pages 10 - 13)

<p style="text-align: right;">Page 14</p> <p>1 N. SPANOS</p> <p>2 A Not really.</p> <p>3 Q How many members of the board were there?</p> <p>4 A I don't remember.</p> <p>5 Q Was it more than two? Because you said two,</p> <p>6 you and this Clufetos.</p> <p>7 A Yeah. Yeah. More than two.</p> <p>8 Q Was there a third person?</p> <p>9 A At least.</p> <p>10 Q Okay. Have you ever had a board meeting of</p> <p>11 the Synapse Foundation?</p> <p>12 A Yeah. We had a -- yes.</p> <p>13 Q Okay. Did you have a board meeting at the</p> <p>14 time Zap.org was formed?</p> <p>15 A No.</p> <p>16 Q Since Zap --</p> <p>17 A Zap -- yeah.</p> <p>18 Q Since Zap.org was formed -- at the time the</p> <p>19 Synapse Foundation created Zap.org, did you have a</p> <p>20 board meeting?</p> <p>21 A Yeah. I think so. Yeah.</p> <p>22 Q Okay. Were minutes taken of the board</p> <p>23 meeting?</p> <p>24 A I don't know.</p> <p>25 Q Well, who took the minutes? Who was</p>	<p style="text-align: right;">Page 16</p> <p>1 N. SPANOS</p> <p>2 MR. HELLER: -- there was a board</p> <p>3 meeting on Synapse Foundation when Zap was formed. He</p> <p>4 did say there was a board meeting.</p> <p>5 MR. GINSBERG: I think your question</p> <p>6 was after Zap.org was formed, not when it was formed.</p> <p>7 I think the testimony was that when it was formed,</p> <p>8 there wasn't. I may be wrong. But that was my</p> <p>9 understanding of his testimony.</p> <p>10 MR. HELLER: You may be wrong. But one</p> <p>11 second. Please stop.</p> <p>12 THE WITNESS: I'm sorry. I'm sorry.</p> <p>13 BY MR. HELLER:</p> <p>14 Q Was the Synapse Foundation formed at the</p> <p>15 same time of the creation of Zap.org?</p> <p>16 A No.</p> <p>17 Q Was the Synapse Foundation formed after the</p> <p>18 creation of Zap.org?</p> <p>19 A No.</p> <p>20 Q Okay. Other than Zap.org, does the Synapse</p> <p>21 Foundation have any other assets?</p> <p>22 A I don't know.</p> <p>23 Q When you said you were a cofounder of the</p> <p>24 Synapse Foundation -- or sorry. Strike that. You</p> <p>25 said you're the cofounder of Zap.org. Who were the</p>
<p style="text-align: right;">Page 15</p> <p>1 N. SPANOS</p> <p>2 responsible for taking minutes of the board meeting at</p> <p>3 Zap.org for the Synapse Foundation?</p> <p>4 A I don't know. There was -- I don't know.</p> <p>5 Q Where were you when the board meeting took</p> <p>6 place?</p> <p>7 A I don't remember. I was --</p> <p>8 Q Were you in this country?</p> <p>9 A I was on the phone.</p> <p>10 Q It was on the phone. Were you on the phone</p> <p>11 in New York?</p> <p>12 A I don't remember that. I'd like to</p> <p>13 remember.</p> <p>14 Q Okay. After that, the board meeting, --</p> <p>15 A I was on the --</p> <p>16 Q -- that took place when Synapse formed</p> <p>17 Zap.org --</p> <p>18 A I don't know if it was on the phone or on</p> <p>19 the Google.</p> <p>20 MR. GINSBERG: Objection. His</p> <p>21 testimony was that wasn't the board meeting when</p> <p>22 Zap.org was formed.</p> <p>23 MR. HELLER: He said -- he said the --</p> <p>24 THE WITNESS: There was no Zap. I</p> <p>25 wasn't on the --</p>	<p style="text-align: right;">Page 17</p> <p>1 N. SPANOS</p> <p>2 other cofounders?</p> <p>3 A I don't know. I don't remember because</p> <p>4 whatever, because people just, you know, hype</p> <p>5 themselves up. I don't know. I don't remember.</p> <p>6 Q Okay. So I'm going to ask you about an</p> <p>7 individual by the name of Ben Young. Is Ben Young a</p> <p>8 cofounder of Zap.org?</p> <p>9 A No.</p> <p>10 Q In Nick Allen a cofounder of Zap.org?</p> <p>11 A No.</p> <p>12 Q Who are the people that hyped themselves up</p> <p>13 as being cofounders of Zap.org?</p> <p>14 MR. GINSBERG: Objection as to form.</p> <p>15 THE WITNESS: I don't know.</p> <p>16 BY MR. HELLER:</p> <p>17 Q Well, you said other people hyped themselves</p> <p>18 up. Who are those people?</p> <p>19 A In general, people hyped themselves up and</p> <p>20 give themselves titles as cofounder and all kinds of</p> <p>21 stuff.</p> <p>22 Q Okay.</p> <p>23 A There's like a hundred Ethereum cofounders</p> <p>24 and founders. So it's just -- I think it's a</p> <p>25 practice. I don't know what it is.</p>

5 (Pages 14 - 17)

Page 18

1 N. SPANOS

2 Q Okay. So who do you recognize as a

3 cofounder of Zap.org other than you?

4 A I don't know what it means, cofounder.

5 Q You mentioned previously during testimony

6 that you believed you were a cofounder of Zap.org. So

7 what in your mind --

8 A Yeah. I mean, it's a feeling.

9 Q Let me finish the question.

10 A Yeah. I'm sorry.

11 Q What in your mind do you understand a

12 cofounder to be?

13 A That's a good question. Is that to form?

14 MR. GINSBERG: That's okay.

15 THE WITNESS: It's fine. I never did

16 this before. I think I saw it in a movie. Someone

17 that was around in the beginning.

18 BY MR. HELLER:

19 Q And you used the term cofounder. So were

20 there other people who were around in the beginning?

21 A Yeah.

22 Q Who?

23 A I don't want to screw this up. I don't know

24 who's self-identifying as cofounder. And --

25 Q I'm not asking who's self-identifies.

Page 19

1 N. SPANOS

2 MR. GINSBERG: Let him finish please,

3 Mr. Heller.

4 THE WITNESS: I'm just saying the

5 reason why I'm hesitating the answer is hesitant in

6 being confident in an answer. You want a confident

7 answer, right?

8 So the reason why I'm hesitating is

9 that I'm not sure who's self-identifying as a

10 cofounder. And I don't really have cofounder as a

11 definition in my brain. I really don't understand the

12 nomenclature.

13 BY MR. HELLER:

14 Q In your brain --

15 A Yeah.

16 Q -- you said cofounder is someone who was

17 around in the beginning.

18 A Yeah.

19 Q Who was around in the beginning other than

20 you?

21 A So they could have been around in the

22 beginning and then they could have left in the

23 beginning. Or they could have like -- you know what I

24 mean? I don't know.

25 Q Who was around in the beginning other than

Page 20

1 N. SPANOS

2 you?

3 MR. GINSBERG: In the what? I didn't

4 understand your question.

5 BY MR. HELLER:

6 Q My question was who was around in the

7 beginning of Zap.org other than Mr. Spanos.

8 A There's a guy who has a company in Poland.

9 I don't really remember his name. It's a weird name.

10 There's a Danish guy who I don't really remember. And

11 even if I had his name in front of me, I couldn't read

12 it because it's just weird. And I don't know.

13 Q Was Ben Young around in the beginning?

14 A Ben Young was around. But there were, you

15 know, a bunch of people. Community members. So was

16 he a community member? You know, the nature of this

17 is looser than let's say like this law firm or a

18 company. It's much looser, these decentralized

19 characters. You know what I mean?

20 Q Not really. Please explain.

21 A It's just looser. It's just looser.

22 There's no organizational chart or maybe there is

23 another. Just that was a loose thing.

24 Q Have you ever looked at the Zap.org website?

25 A Yeah. I don't like it.

Page 21

1 N. SPANOS

2 MR. HELLER: Let's mark this.

3 COURT REPORTER: How do you want to

4 mark it?

5 MR. HELLER: Call it defendant's A.

6 Or, you know, Spanos A.

7 (Exhibit Spanos A was marked for

8 identification.)

9 THE WITNESS: You got any Lysol? I've

10 got to look at that? I don't have a spleen.

11 MR. HELLER: Sorry to hear that.

12 THE WITNESS: I've had pneumothoraxes.

13 It took a lot to get me out here, mentally to leave

14 the house.

15 BY MR. HELLER:

16 Q Mr. Spanos, what I've placed before you is a

17 document that's been marked as Spanos A for

18 identification.

19 A Yes.

20 Q And it's an eight-page document marked RVH -

21 - Bates-stamped RVH_000290000297. And it appears to

22 be a printout from the Zap.org website. Have you ever

23 seen this before?

24 A No. I've never seen this.

25 Q Okay. So I'll ask you to turn to page 293.

6 (Pages 18 - 21)

<p style="text-align: right;">Page 22</p> <p>1 N. SPANOS</p> <p>2 A 293?</p> <p>3 Q Yeah. You see in the bottom it says --</p> <p>4 A Yeah. But it's two of eight.</p> <p>5 Q Okay. Turn to four of eight. How's that?</p> <p>6 That's a little bit different.</p> <p>7 A No. I'm just sorry. I can't see that well.</p> <p>8 I've had a lot of eye surgeries where people --</p> <p>9 MR. GINSBERG: Try not to talk over --</p> <p>10 THE WITNESS: Oh, I got it. Sorry.</p> <p>11 MR. GINSBERG: Let him finish his</p> <p>12 sentence.</p> <p>13 THE WITNESS: Okay. Oh, wow. Nice.</p> <p>14 BY MR. HELLER:</p> <p>15 Q So it mentions "Our Team", the Zap team.</p> <p>16 And it has the advisory board.</p> <p>17 A Yeah. Yeah. Yeah.</p> <p>18 Q And it mentions Sean Combs, Kumail Akbari,</p> <p>19 Andy Goldstein, Jonathan Heyman, Dwayne Campbell,</p> <p>20 Danny Zatterman, Evan Renov and Matt Hollander. Do you</p> <p>21 recognize any of those individuals?</p> <p>22 A Yes.</p> <p>23 Q And are each of those individuals members of</p> <p>24 the advisory board of the Zap.org?</p> <p>25 A No.</p>	<p style="text-align: right;">Page 24</p> <p>1 N. SPANOS</p> <p>2 We don't have to replay it.</p> <p>3 COURT REPORTER: All right.</p> <p>4 BY MR. HELLER:</p> <p>5 Q Who is not on the advisory board of Zap.org</p> <p>6 from the list of eight people that I just read to you?</p> <p>7 A All of them.</p> <p>8 Q Were any of them ever on the advisory board</p> <p>9 of Zap.org?</p> <p>10 A No.</p> <p>11 Q Turn to the next page where it says "The Zap</p> <p>12 Team." And it lists 12 individuals on the Zap team.</p> <p>13 You know, I'm going to go back to the prior with the</p> <p>14 Zap -- the advisory board.</p> <p>15 Were any of the individuals listed, the</p> <p>16 eight individuals, on the advisory board of the</p> <p>17 Synapse Foundation?</p> <p>18 A Yes.</p> <p>19 Q Which of the eight individuals were on the</p> <p>20 advisory board of the Synapse Foundation?</p> <p>21 A The guy from Jamaica.</p> <p>22 Q Who's the guy from Jamaica?</p> <p>23 A Dwayne.</p> <p>24 MR. GINSBERG: Who did you say? I'm</p> <p>25 sorry.</p>
<p style="text-align: right;">Page 23</p> <p>1 N. SPANOS</p> <p>2 Q Okay. Who's not a member of the advisory</p> <p>3 board?</p> <p>4 A Where did this come from?</p> <p>5 Q The Zap.org website.</p> <p>6 A I don't think so.</p> <p>7 Q I'm focusing on the page before the page</p> <p>8 you're turning to. I'm only focusing on the advisory</p> <p>9 board.</p> <p>10 MR. GINSBERG: Mr. Spanos has a right</p> <p>11 to look at the entire document, Mr. Heller.</p> <p>12 MR. HELLER: Fine. No problem.</p> <p>13 THE WITNESS: No. I mean, I never --</p> <p>14 say that question again.</p> <p>15 MR. HELLER: Can you play back the</p> <p>16 question, please?</p> <p>17 MR. GINSBERG: It's going to be a lot</p> <p>18 faster if you can repeat it.</p> <p>19 MR. HELLER: I don't think I can</p> <p>20 remember what the question was.</p> <p>21 THE WITNESS: Who's not --</p> <p>22 MR. HELLER: Okay. Okay. So who's</p> <p>23 not.</p> <p>24 COURT REPORTER: I'm -- okay. Hold on.</p> <p>25 MR. HELLER: It's fine. Let's go back.</p>	<p style="text-align: right;">Page 25</p> <p>1 N. SPANOS</p> <p>2 THE WITNESS: Hmm?</p> <p>3 MR. GINSBERG: Who'd you say? Okay.</p> <p>4 THE WITNESS: I'm having a hard time</p> <p>5 remembering. But Dwayne, maybe Hollander, maybe. And</p> <p>6 this is not on the Zap.org site, just FYI.</p> <p>7 BY MR. HELLER:</p> <p>8 Q Not currently.</p> <p>9 A Yeah.</p> <p>10 Q Not currently. It was taken off after it</p> <p>11 was printed out.</p> <p>12 A So you're saying --</p> <p>13 MR. GINSBERG: Wait, wait. Are you</p> <p>14 making a representation?</p> <p>15 MR. HELLER: Yes. I printed it out off</p> <p>16 of the Zap.org website.</p> <p>17 THE WITNESS: So this was on there?</p> <p>18 MR. HELLER: Oh, yes.</p> <p>19 BY MR. HELLER:</p> <p>20 Q Was Sean Combs at any point in time ever</p> <p>21 affiliated or working with the Synapse Foundation?</p> <p>22 A You know what, I don't remember. I don't</p> <p>23 remember what category, what you can call him, title.</p> <p>24 MR. GINSBERG: That wasn't the</p> <p>25 question.</p>

7 (Pages 22 - 25)

Page 26

1 N. SPANOS
2 THE WITNESS: Oh, what was the
3 question?
4 BY MR. HELLER:
5 Q Was he at any time --
6 A Oh.
7 Q -- affiliated?
8 A Yeah.
9 Q Okay. What was his role?
10 A That's the answer I gave before. I don't
11 recall his exact description of his role.
12 Q Do you recall anything about his role?
13 A You know, I don't have the paperwork in
14 front of me to answer --
15 Q Oh, so there's paperwork?
16 MR. GINSBERG: Excuse me. Please don't
17 interrupt him.
18 MR. HELLER: I'm sorry.
19 THE WITNESS: Don't interrupt.
20 BY MR. HELLER:
21 Q Go. Tell me about the paperwork.
22 A Well, I remember that there was some paper.
23 Q Where?
24 A So I don't know where they are.
25 Q Oh.

Page 27

1 N. SPANOS
2 A But I would love to be able to read them to
3 know what the heck, you know, the job description was.
4 Q Okay. And who entered into that paperwork
5 with Sean Combs?
6 MR. GINSBERG: Objection. There was no
7 testimony someone entered into paperwork with Mr.
8 Combs.
9 BY MR. HELLER:
10 Q Please describe the paperwork.
11 A I don't remember. But it was paper I think.
12 Q You're talking about paper that you wished
13 you would have in front of you so it could refresh
14 your recollection as to what Sean "Puffy" Combs did
15 for the Synapse Foundation. What type of paperwork
16 were you thinking of?
17 A I don't remember. But it was -- I'm trying
18 to answer.
19 Q I hope so.
20 A I am. I'm trying to answer.
21 MR. GINSBERG: Mr. Heller, you're
22 making faces at Mr. Spanos. You're interrupting.
23 You're --
24 MR. HELLER: I'm not making any faces.
25 I totally, totally object to that.

Page 28

1 N. SPANOS
2 THE WITNESS: I'm trying to answer.
3 MR. GINSBERG: Excuse me. Now you're
4 interrupting me.
5 MR. HELLER: Well, don't say I'm making
6 faces when I'm not making faces. Don't say that.
7 That's not true.
8 MR. GINSBERG: Mr. Heller, don't tell
9 me what to do. I'm making an objection.
10 MR. HELLER: Make the objection.
11 MR. GINSBERG: If you don't like it,
12 then you can make a record. But you are making faces.
13 You're shrugging your shoulders. You're interrupting
14 Mr. Spanos. And I ask you respectfully not to do
15 that.
16 MR. HELLER: I take your request under
17 advisement. And I will respect Mr. Spanos. But I do
18 object to the fact that you're saying I'm making
19 faces. I am not.
20 BY MR. HELLER:
21 Q Please answer the question.
22 A I'm trying. I think -- I think it was a fax
23 or, you know, I don't know what it was. But there was
24 a piece of paper like one -- oh, you know what it was?
25 There was a phone conversation and what, you know,

Page 29

1 N. SPANOS
2 people wanted from him.
3 Q Did you participate in that phone
4 conversation?
5 A Yeah.
6 Q Who --
7 A Well, they wanted -- you know, this was
8 noise. You know, if someone -- I'm pretty popular in
9 this industry. And, you know, I found myself put on
10 websites as founder on the things I never heard of.
11 As a matter of fact, I picked up some -- I
12 was in a cab. I jumped in a cab and someone jumped in
13 the cab at the same time. I should have figured --
14 and I said, well, where are you going. A Chinese guy.
15 He goes I'm going to the East Village. And I said,
16 oh, I'll take you there. I'll drop you off, because I
17 felt bad.
18 And the guy said he was interested in
19 blockchain to me because he know who I was apparently.
20 And then he went and he put my name on his site as a
21 founder or, I don't know. I don't know if it was a
22 founder. But he put his name on my site.
23 MR. GINSBERG: Your name on his site.
24 THE WITNESS: Yeah. And I had nothing
25 to do with that guy. Does Mr. Herskowitz want some of

8 (Pages 26 - 29)

Page 30

1 N. SPANOS
2 him? Because he can have all he wants. You know what
3 I mean? I mean, there's other --
4 MR. GINSBERG: There's no question
5 pending.
6 THE WITNESS: All right. All right.
7 I'm just saying that people --
8 MR. HELLER: Peter? Please. I don't
9 like those digs. If he's going to do a dig, then it's
10 going to get very nasty.
11 MR. GINSBERG: Let's continue.
12 THE WITNESS: I didn't do a dig. What
13 is a dig?
14 MR. GINSBERG: Let's continue the
15 deposition, please.
16 THE WITNESS: I didn't do a dig. I'm
17 not as smart as you guys.
18 MR. GINSBERG: Is there a question
19 pending?
20 MR. HELLER: No.
21 MR. GINSBERG: If there are no more
22 questions, we can leave. If there are questions,
23 let's proceed.
24 MR. HELLER: There are a lot of
25 questions.

Page 31

1 N. SPANOS
2 MR. GINSBERG: Okay. Then let's
3 proceed.
4 BY MR. HELLER:
5 Q Where does Zap.org keep its paperwork?
6 A It's pretty much a paperless world right
7 now. When I said there was a piece of paper or there
8 was paperwork, you know, I don't know if it was filed
9 or anything like that. Is that what you're asking me?
10 MR. GINSBERG: No. He just wants to
11 know --
12 THE WITNESS: I don't know. I don't
13 know. Either Isle of Man or Switzerland. I don't
14 know.
15 BY MR. HELLER:
16 Q How do you communicate with individuals in
17 the Synapse Foundation?
18 A It's been a --
19 MR. GINSBERG: Objection. Assumes
20 facts not in evidence.
21 BY MR. HELLER:
22 Q Do you communicate with people from the
23 Synapse Foundation?
24 A I can answer? Very sporadically.
25 Q When you sporadically communicate with

Page 32

1 N. SPANOS
2 people from the Synapse Foundation, how do you
3 communicate?
4 A Over like, I don't know, some kind of
5 audible because I'm not -- my eyeballs aren't that
6 good, so. I've had many surgeries in my eyes, and not
7 LASIK because I have -- so I don't really use email
8 that much. You can attest to that, right? I don't
9 read my email.
10 Q Have you ever communicated electronically
11 with anyone in connection with --
12 A Over the telephone.
13 Q Have you -- could you please let me finish
14 my question?
15 A I'm sorry.
16 MR. GINSBERG: Let him ask a question.
17 THE WITNESS: I'm sorry.
18 BY MR. HELLER:
19 Q Have you ever communicated electronically
20 with anybody from the Synapse Foundation?
21 A Yes. Over the phone. Over apps. Audible.
22 Q Okay. Are those --
23 A Like WhatsApp or something like that. I
24 don't know if it was --
25 Q And are those apps transcribed --

Page 33

1 N. SPANOS
2 A Something else.
3 Q And are those apps transcribed into writing?
4 A No. Should they?
5 MR. GINSBERG: No. Come on. Just
6 answer his questions.
7 THE WITNESS: Well, I'm saying I don't
8 know.
9 MR. GINSBERG: You're not asking
10 questions. He is.
11 THE WITNESS: Oh, he's asking
12 questions. Don't get mad at me. I don't want you to
13 get mad at me.
14 BY MR. HELLER:
15 Q Do you ever use Twitter?
16 A Well, I have people that use Twitter for me.
17 Q Who?
18 A I don't know. Different people over time.
19 Q Who?
20 A That's a good question. From the beginning
21 of Twitter, of my use on Twitter?
22 Q From the beginning of your use on Twitter.
23 Yes.
24 A I don't know. Whatever. People say to me,
25 hey, you know, send this out because x, y, z. Send

Page 34

1 N. SPANOS

2 this out because apparently I have a bullhorn to the

3 community. So people ask me to tweet things like what

4 the hell is his name, like John Matthews I think asked

5 me to -- from Global Arena Holdings, asked me to tweet

6 things out.

7 Q Other than Mr. Mathews, who asked you to

8 tweet things out?

9 A Or I think he told me to stop tweeting

10 things out. I don't remember. I think he told me --

11 I don't know. I don't know. It's a promotional tool

12 that people want, as a matter of fact, to pay me to

13 do.

14 Q Do you ever tweet things out?

15 A Once in a while.

16 Q Okay. And do you do it yourself?

17 A Whoever's next to me. I make sure that they

18 -- I don't know.

19 Q So when do --

20 A Like right now if I was going to tweet

21 something, I'd say, oh, I want to tweet. What does

22 this look like? Is that what it -- you know what I

23 mean?

24 MR. HELLER: Off the record, please.

25 COURT REPORTER: Going of the record.

Page 35

1 N. SPANOS

2 The time now is --

3 THE WITNESS: Should I go to the

4 bathroom?

5 COURT REPORTER: -- 11:08 a.m.

6 (Off the record.)

7 COURT REPORTER: Back on the record.

8 The time now is 11:19 a.m.

9 MR. HELLER: Okay. Peter, for the

10 record, unless you object, whenever I refer to

11 Zap.org, I am referring to the Synapse Foundation as

12 well. I'm referring to them as the same --

13 MR. GINSBERG: I think you have to

14 separate them out.

15 MR. HELLER: So I'll separate them out

16 into two questions for each one.

17 BY MR. HELLER:

18 Q Who is Kumail Akbari?

19 A A friend of mine that I've known for a long

20 time.

21 Q Is Kumail Akbari in any way associated with

22 the Synapse Foundation?

23 A No.

24 Q Is Kumail Akbari in any way affiliated with

25 Zap.org?

Page 36

1 N. SPANOS

2 A No.

3 Q Has Kumail Akbari done any work or performed

4 any services on behalf of the Synapse Foundation?

5 A I'm not -- I can't answer that positive or

6 negative. I don't know a hundred percent.

7 Q Do you know for certain that he has not done

8 -- performed any services for the Synapse Foundation?

9 MR. GINSBERG: You can't write

10 something because --

11 MR. HELLER: There's a question

12 pending.

13 THE WITNESS: Oh, I can't?

14 MR. GINSBERG: No.

15 THE WITNESS: I want to ask you --

16 MR. HELLER: There's a question

17 pending.

18 THE WITNESS: -- how to answer.

19 MR. GINSBERG: There's a question

20 pending.

21 THE WITNESS: Oh, I can't?

22 MR. GINSBERG: Not while there's a

23 question pending.

24 THE WITNESS: Wow. All right. Say

25 that again. I didn't hear. I don't remember what you

Page 37

1 N. SPANOS

2 said.

3 BY MR. HELLER:

4 Q Are you able to say for certain that Kumail

5 Akbari has performed no services for the Synapse

6 Foundation?

7 A No. Can I do it now? Can I write something

8 now?

9 MR. GINSBERG: Yeah. Now there's no

10 question pending.

11 THE WITNESS: Okay. Hold on a second.

12 I want to ask him a question properly.

13 MR. HELLER: All right. Let the record

14 reflect that the witness is writing a note to his

15 attorney.

16 MR. GINSBERG: Okay.

17 THE WITNESS: All I'm saying --

18 MR. GINSBERG: -- a question you can

19 answer.

20 BY MR. HELLER:

21 Q Has Kumail Akbari provided any services on

22 behalf of Zap.org?

23 MR. GINSBERG: You can -- you can tell

24 him that. Go ahead.

25 THE WITNESS: All right. That was my

<p style="text-align: right;">Page 38</p> <p>1 N. SPANOS</p> <p>2 thing. So services, what do you mean by services?</p> <p>3 BY MR. HELLER:</p> <p>4 Q Has he performed any work, has he been</p> <p>5 affiliated with, has he helped? What has he done, if</p> <p>6 anything, for Zap.org?</p> <p>7 MR. GINSBERG: Are you talking about</p> <p>8 either compensated or uncompensated?</p> <p>9 MR. HELLER: Yes.</p> <p>10 THE WITNESS: So yeah, uncompensated.</p> <p>11 He's probably helped out. Yeah. I didn't understand</p> <p>12 if it was -- what the question was when you said work,</p> <p>13 whatever. Work.</p> <p>14 BY MR. HELLER:</p> <p>15 Q What type of uncompensated services --</p> <p>16 A Yeah. Volunteer.</p> <p>17 Q -- has Mr. Akbari and when did he volunteer?</p> <p>18 A I don't know. He's -- I don't want to put</p> <p>19 this on the record about him. But he's not really a</p> <p>20 hundred percent person.</p> <p>21 Q Where does Kumail Akbari live?</p> <p>22 A I don't know.</p> <p>23 Q Does he live in New York?</p> <p>24 A I don't know.</p> <p>25 Q Does he live in -- does he work in New York?</p>	<p style="text-align: right;">Page 40</p> <p>1 N. SPANOS</p> <p>2 (Off the record.)</p> <p>3 COURT REPORTER: We're back on the</p> <p>4 record. The time now is 11:26 a.m.</p> <p>5 BY MR. HELLER:</p> <p>6 Q Was Mr. Akbari ever affiliated with the</p> <p>7 Bitcoin Center of New York City?</p> <p>8 A He came around, as did many other people.</p> <p>9 Hundreds of people came around.</p> <p>10 Q Other than coming around, did he perform any</p> <p>11 compensated or uncompensated services for the Bitcoin</p> <p>12 Center of New York City?</p> <p>13 A I don't think so.</p> <p>14 Q Who is Andy Goldstein?</p> <p>15 MR. GINSBERG: I'm sorry? What's the</p> <p>16 name?</p> <p>17 BY MR. HELLER:</p> <p>18 Q Andy Goldstein.</p> <p>19 A He's -- I don't know what you mean by that.</p> <p>20 He's a human. He's in the industry.</p> <p>21 Q Okay.</p> <p>22 A I don't know what you mean by who he is.</p> <p>23 Q Was Andy Goldstein ever part of the advisory</p> <p>24 board of the Synapse Foundation?</p> <p>25 A He had given advice. I'm not sure if that</p>
<p style="text-align: right;">Page 39</p> <p>1 N. SPANOS</p> <p>2 MR. GINSBERG: Objection. Assumes</p> <p>3 facts not in evidence.</p> <p>4 BY MR. HELLER:</p> <p>5 Q Where does Mr. Akbari work?</p> <p>6 MR. GINSBERG: Same objection. Assumes</p> <p>7 facts not in evidence.</p> <p>8 BY MR. HELLER:</p> <p>9 Q You testified previously that Mr. Akbari is</p> <p>10 a good friend.</p> <p>11 A Yeah. He's lived in many places.</p> <p>12 Q Okay.</p> <p>13 A I'm not sure where he lives right now.</p> <p>14 Q Has he ever lived in New York?</p> <p>15 A I'm not sure.</p> <p>16 Q Did Mr. Akbari ever -- was he ever</p> <p>17 affiliated with the Bitcoin --</p> <p>18 THE WITNESS: Can we go off the record</p> <p>19 a second?</p> <p>20 MR. HELLER: Go off the record.</p> <p>21 THE WITNESS: I want to go off the</p> <p>22 record because I want to say something about Kumail</p> <p>23 that I don't it to be on the record.</p> <p>24 COURT REPORTER: Okay. We're going</p> <p>25 off the record. The time now is 11:25 a.m.</p>	<p style="text-align: right;">Page 41</p> <p>1 N. SPANOS</p> <p>2 constitutes -- you're going by this piece of paper</p> <p>3 here. And this piece of paper, you know, if it's a</p> <p>4 representation of the website, I'm not sure, you know.</p> <p>5 So he gave advice. So yeah, I don't know. You want</p> <p>6 to call -- he was an advisor.</p> <p>7 Q So are you saying -- let's strike that. Is</p> <p>8 this piece of paper that's in front of you that's</p> <p>9 marked as Spanos A, and in particular page four of</p> <p>10 eight, is it inaccurate in any way?</p> <p>11 A No. I'm just -- I'm not sure because I'm</p> <p>12 not familiar with it.</p> <p>13 Q Okay.</p> <p>14 A So I'm not sure if it's inaccurate. I'm not</p> <p>15 sure at which moment. I know that a default was if</p> <p>16 nobody -- if people that were working on the website</p> <p>17 didn't know the -- didn't know like where the person</p> <p>18 came from or whatever, they would put as a default</p> <p>19 Bitcoin Center because everyone went to the Bitcoin</p> <p>20 Center.</p> <p>21 It's not a representation of if someone</p> <p>22 worked at the Bitcoin Center. I didn't agree to that.</p> <p>23 But that's what happened.</p> <p>24 Q Who prepared the website for the Synapse</p> <p>25 Foundation?</p>

11 (Pages 38 - 41)

Page 42

1 N. SPANOS

2 A There were many, many people, some in the

3 Armenia, some in Belarus.

4 Q And who had --

5 A To the best of my knowledge, there was

6 probably more, I don't know.

7 Q Who from the Synapse Foundation communicated

8 with the individuals who prepared the website for

9 Zap.org?

10 A It was probably conference -- a conference

11 call, a bunch of people.

12 Q Were you on the conference call?

13 A Some. But not all the time.

14 Q And during those conference calls that you

15 were participating in with the website people, who

16 else participated in the conference calls?

17 A You know, the -- oh, excuse me. Which

18 conference call? For this -- to build this site?

19 Q For the website.

20 A A bunch of Belarusians, a bunch of

21 Armenians.

22 Q How many Belarusians?

23 A I don't know.

24 Q How many Armenians?

25 A Three or less of each.

Page 43

1 N. SPANOS

2 Q And who --

3 A Not at the same time. I don't think the

4 Belarusians. I'm not sure.

5 Q Who from the Synapse Foundation participated

6 in this conference call?

7 A Well, I would participate, you know, when I

8 was told. But --

9 Q And who would have told you to participate?

10 MR. GINSBERG: I'm not sure he was done

11 with his answer. Were you done with your answer?

12 THE WITNESS: I think so.

13 BY MR. HELLER:

14 Q Who would have told you to participate?

15 A I'm trying to think of the times that it

16 occurred so I can give you the right answer.

17 Q How many times did these --

18 MR. GINSBERG: Well wait --

19 MR. HELLER: Okay.

20 THE WITNESS: A bunch.

21 MR. GINSBERG: I mean, he's trying to

22 answer the question.

23 MR. HELLER: I --

24 THE WITNESS: I'm just trying to

25 remember. I'm trying to remember. I'm actually

Page 44

1 N. SPANOS

2 trying to give you my memory of it, not just -- like

3 one time I saw that everyone was on here as from the

4 Bitcoin Center. And I called up the Belarusians. Oh,

5 there was Polacks too. There's Polish too.

6 BY MR. HELLER:

7 Q All right. So can you --

8 A I said why is everyone on there from the

9 Bitcoin Center. That guy never even went to the

10 Bitcoin Center. Why does it say that he's from the

11 Bitcoin Center? He goes, oh, that's the default.

12 MR. GINSBERG: But the question, Nick,

13 is when you participated in those calls --

14 THE WITNESS: That was --

15 MR. GINSBERG: -- who directed you to

16 participate in the calls?

17 THE WITNESS: Well, it depends. You

18 know, yeah. So someone. I don't know. Someone or

19 someone from -- either Iorgos or a Belarusian or an

20 Armenian or a Dane.

21 BY MR. HELLER:

22 Q Where were you when you participated in the

23 conference calls?

24 A I'm not sure. I don't remember.

25 Q Do you recall how --

Page 45

1 N. SPANOS

2 A Where were you when you -- I don't know

3 that. It doesn't --

4 Q How many calls do you remember?

5 A Like I remember when the space shuttle blew

6 up --

7 Q How many calls --

8 A -- where I was. But I don't remember where

9 I am when, you know, someone's giving me a phone call.

10 Q How many calls did you participate in

11 regarding the website?

12 A I don't remember. But probably a bunch.

13 Q You've mentioned a call when you discussed -

14 - when you referenced the Bitcoin Center.

15 A Yeah.

16 Q Do you recall when that call took place?

17 A A few years ago. I don't remember the exact

18 day.

19 Q Do you remember who you were speaking to at

20 the time?

21 A Hold on. I think it was a Polish guy named

22 Roman.

23 Q Do you recall anyone else who was on the

24 call at that time?

25 A The Danish guy. I don't know.

12 (Pages 42 - 45)

<p style="text-align: right;">Page 46</p> <p>1 N. SPANOS</p> <p>2 Q Did Ben Young ever --</p> <p>3 A It was a bunch of people, a bunch of people.</p> <p>4 Q Did Ben Young have any prior affiliation to</p> <p>5 the Bitcoin Center?</p> <p>6 A Ben Young did.</p> <p>7 Q Did Steve Geros, G-E-R-O-S, have any prior</p> <p>8 affiliation --</p> <p>9 A You know, I don't remember --</p> <p>10 Q -- to the Bitcoin Center?</p> <p>11 MR. GINSBERG: Let him finish his</p> <p>12 question.</p> <p>13 THE WITNESS: Oh, I'm sorry.</p> <p>14 BY MR. HELLER:</p> <p>15 Q Did Steve Geros have any prior affiliation</p> <p>16 with the Bitcoin Center?</p> <p>17 A So affiliation, again, my question is what's</p> <p>18 the definition of affiliation, meaning paid or unpaid</p> <p>19 --</p> <p>20 Q Paid.</p> <p>21 A -- or a visitor?</p> <p>22 Q Paid or unpaid.</p> <p>23 A Or a visitor? Because it was a public space</p> <p>24 for any -- you know, the doors were open to anyone to</p> <p>25 walk in. Even Mr. Herskowitz walked in.</p>	<p style="text-align: right;">Page 48</p> <p>1 N. SPANOS</p> <p>2 don't remember.</p> <p>3 Q Did Eric Dixon perform any services, paid or</p> <p>4 unpaid services --</p> <p>5 A I think he performed --</p> <p>6 MR. GINSBERG: Let him finish. He</p> <p>7 hasn't --</p> <p>8 THE WITNESS: Oh, I'm sorry.</p> <p>9 MR. GINSBERG: -- finished the</p> <p>10 question.</p> <p>11 THE WITNESS: Okay. I'm sorry.</p> <p>12 BY MR. HELLER:</p> <p>13 Q Did Eric Dixon perform any paid or unpaid</p> <p>14 services for Blockchain Technologies?</p> <p>15 A I don't remember. But I think he worked.</p> <p>16 Yeah. I don't remember. You mean paid or unpaid?</p> <p>17 Yeah.</p> <p>18 Q Did Ben Dixon perform any paid or unpaid</p> <p>19 services for the Synapse Foundation?</p> <p>20 A No.</p> <p>21 MR. GINSBERG: Object. Ben Dixon?</p> <p>22 BY MR. HELLER:</p> <p>23 Q Sorry. Did Eric Dixon, thank you, perform</p> <p>24 any paid or unpaid services for the Synapse</p> <p>25 Foundation?</p>
<p style="text-align: right;">Page 47</p> <p>1 N. SPANOS</p> <p>2 Q Not only someone who just walked in. Did he</p> <p>3 have any role --</p> <p>4 A He walked in over and over and over.</p> <p>5 Q -- in connection --</p> <p>6 MR. GINSBERG: Let him finish the</p> <p>7 question so the record's clear. And the question</p> <p>8 really isn't particularly clear. So maybe you could</p> <p>9 define what you mean by affiliated.</p> <p>10 BY MR. HELLER:</p> <p>11 Q Did Steve Geros hold any titles with the</p> <p>12 Bitcoin Center?</p> <p>13 A I don't remember.</p> <p>14 Q Did Steve Geros receive any compensation</p> <p>15 from the Bitcoin center?</p> <p>16 A I don't remember. No.</p> <p>17 Q Did he receive any compensation from</p> <p>18 Blockchain Technologies?</p> <p>19 A I don't remember. He might have.</p> <p>20 Q Did Ben Young receive compensation from</p> <p>21 Blockchain Technologies?</p> <p>22 A I think so. I think so.</p> <p>23 Q Did Eric Dixon receive any compensation from</p> <p>24 Blockchain Technologies?</p> <p>25 A You know, I don't know. I don't know. I</p>	<p style="text-align: right;">Page 49</p> <p>1 N. SPANOS</p> <p>2 A I don't think so. Did he perform any paid</p> <p>3 or unpaid services? Well, that would be what your</p> <p>4 definition of the word services is.</p> <p>5 Q Did Eric Dixon do anything whatsoever in</p> <p>6 this world on behalf of the Synapse Foundation?</p> <p>7 A On behalf of the Synapse Foundation?</p> <p>8 Q Yes.</p> <p>9 A I don't know. I don't remember.</p> <p>10 Q Where does Eric Dixon reside?</p> <p>11 A Because I -- excuse me?</p> <p>12 Q Where does Eric Dixon reside?</p> <p>13 A Resolve?</p> <p>14 Q Reside.</p> <p>15 A In New Jersey.</p> <p>16 Q Where does Eric Dixon work?</p> <p>17 A I don't know. I don't remember. I know he</p> <p>18 had an office somewhere where they had the bombing</p> <p>19 with the pressure cookers. It was right outside his</p> <p>20 office or something. I don't know where though.</p> <p>21 Q In Manhattan?</p> <p>22 A In Manhattan. But I don't know if he's</p> <p>23 still there. I don't know. I don't know.</p> <p>24 Q Did Ben Young --</p> <p>25 A I don't know anymore.</p>

13 (Pages 46 - 49)

Page 50

1 N. SPANOS

2 Q -- perform any services, anything in the

3 world, any work on behalf of the Synapse Foundation,

4 paid or unpaid?

5 A I'm not sure.

6 Q As you sit here today, can you say that he

7 did not do anything on behalf of the Synapse

8 Foundation?

9 A Well, I'm not sure. I mean, Ben Young under

10 contract of another company, you know. I don't know.

11 Q Did Ben Young or any entity with whom he is

12 affiliated --

13 A Probably. Let him finish the question.

14 MR. GINSBERG: Let him finish the

15 question.

16 THE WITNESS: I'm sorry. I'm sorry.

17 I'm trying to be helpful. I am, you know?

18 BY MR. HELLER:

19 Q -- perform -- perform any services, paid or

20 unpaid on behalf of the Synapse Foundation?

21 A Listen, I did a Simon Says with 12,000

22 people two years in a row and won both times. So

23 you've got to ask very clearly. I'll give you a clear

24 answer. So services, what does that mean? I don't

25 understand.

Page 51

1 N. SPANOS

2 Q Okay. Anything in the world on behalf of

3 the Synapse Foundation. Did he do anything?

4 A Yes.

5 MR. GINSBERG: You know, wait a minute.

6 Objection. I don't know what on behalf of means

7 either. If you --

8 THE WITNESS: Yeah.

9 MR. GINSBERG: If you -- these

10 questions really don't go I think to the substance and

11 you're not asking geographically where it occurred,

12 what it occurred.

13 MR. HELLER: Then you will --

14 MR. GINSBERG: You're asking some very

15 general questions with terms that aren't defined.

16 MR. HELLER: Then you'll object as to

17 foundation if I don't ask first whether he did

18 something. Then I have to ask where he did it. So if

19 I get an answer whether or not he did, then I will ask

20 where he did it.

21 MR. GINSBERG: But you're not.

22 MR. HELLER: But I'm not even getting

23 an answer when and where or what he did.

24 MR. GINSBERG: That's not correct. The

25 record --

Page 52

1 N. SPANOS

2 MR. HELLER: That is true.

3 MR. GINSBERG: Excuse me. The record

4 reflects that when Mr. Spanos, after trying to

5 understand these very broad questions with undefined

6 terms, gives you an answer, you don't follow up and

7 you're not asking for any specifics. I'm not really

8 quite sure exactly what you're doing.

9 But it seems to me if you think any of

10 these questions relate to jurisdiction, that thought

11 is misguided. And I'm not really sure what we're

12 doing with these questions. So perhaps if you could

13 define your terms and make them more specific, we

14 could move along.

15 MR. HELLER: Perhaps if your client

16 will answer the questions, we can move along. Let's

17 go.

18 MR. GINSBERG: He's trying to answer --

19 MR. HELLER: No. He's not.

20 MR. GINSBERG: -- very difficult

21 amorphous, opaque questions.

22 MR. HELLER: I totally disagree with

23 you. But you can have your opinion and I can have

24 mine.

25 BY MR. HELLER:

Page 53

1 N. SPANOS

2 Q Let's start from scratch. Who is Ben Young?

3 Strike that. How are you familiar with Ben Young?

4 A He walked into the Bitcoin Center years ago

5 on 40 Wall.

6 Q And after he walked into the Bitcoin Center

7 at 40 Wall, did you individually or on behalf of any

8 entity have any business relationships with Ben Young?

9 MR. GINSBERG: On that day?

10 BY MR. HELLER:

11 Q After. He walked into the Bitcoin Center.

12 Did --

13 MR. GINSBERG: I'm not asking you

14 whether you mean after on that date that he walked in

15 or any time after.

16 BY MR. HELLER:

17 Q Any time after that day.

18 MR. GINSBERG: Can you define business

19 relationship?

20 BY MR. HELLER:

21 Q Did you have any entity, did you participate

22 in any entity together where you both had a business

23 relationship, whether it was Blockchain Technologies,

24 the Synapse Foundation, Zap.org?

25 MR. GINSBERG: Objection. Form.

<p style="text-align: right;">Page 54</p> <p>1 N. SPANOS</p> <p>2 BY MR. HELLER:</p> <p>3 Q You can answer.</p> <p>4 MR. GINSBERG: If you can understand</p> <p>5 it, you can answer.</p> <p>6 THE WITNESS: I can't give you a yes or</p> <p>7 no because you just put a triple bind in there. So if</p> <p>8 I say yes, then that means yes to all three?</p> <p>9 MR. HELLER: No.</p> <p>10 THE WITNESS: You know, you've got to</p> <p>11 make a question about it.</p> <p>12 MR. HELLER: No. You --</p> <p>13 MR. GINSBERG: That's because the</p> <p>14 question is objectionable as to form. If you could</p> <p>15 break it down and ask straightforward questions --</p> <p>16 THE WITNESS: Yeah.</p> <p>17 MR. GINSBERG: -- Mr. Spanos would do</p> <p>18 his best to respond.</p> <p>19 BY MR. HELLER:</p> <p>20 Q Did you and Mr. Young have any business</p> <p>21 relationship -- strike that. Did Blockchain</p> <p>22 Technologies Inc. have any business relationship with</p> <p>23 Ben Young or any entity with which Ben Young was</p> <p>24 affiliated?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 56</p> <p>1 N. SPANOS</p> <p>2 MR. GINSBERG: Objection as to form.</p> <p>3 THE WITNESS: You guys said a bunch of</p> <p>4 stuff and I got confused. I don't know. Can you say</p> <p>5 it one more time, please? I'm sorry.</p> <p>6 BY MR. HELLER:</p> <p>7 Q What, if anything, did Mr. Young do</p> <p>8 individually or on behalf of an entity with the</p> <p>9 Synapse Foundation from a business standpoint, not an</p> <p>10 individual standpoint?</p> <p>11 A Talk a lot.</p> <p>12 Q Did he have --</p> <p>13 A To girls too.</p> <p>14 Q Did he have meetings?</p> <p>15 MR. GINSBERG: Talking about a business</p> <p>16 relationship. Did Young have a business relationship</p> <p>17 with Synapse?</p> <p>18 THE WITNESS: I don't think so. I</p> <p>19 don't know. I mean, I don't remember if Young himself</p> <p>20 had or maybe I didn't even -- was privy to it. But I</p> <p>21 don't know.</p> <p>22 I think, you know, Young was around a</p> <p>23 lot. And he spoke knowledgeably and at the Bitcoin</p> <p>24 Center, you know, years ago. But then he, you know --</p> <p>25 geez. I don't want to say anything bad. But he --</p>
<p style="text-align: right;">Page 55</p> <p>1 N. SPANOS</p> <p>2 Q Okay. Was it with Mr. Young individually or</p> <p>3 with an entity with whom which he was affiliated?</p> <p>4 A I don't remember.</p> <p>5 Q And did you or any -- no. Strike that. Did</p> <p>6 Ben Young have any business relationship, Ben Young or</p> <p>7 any entity with whom he was affiliated, have any</p> <p>8 business relationship with the Synapse Foundation?</p> <p>9 A Any relationship?</p> <p>10 Q Any relationship.</p> <p>11 A Sure.</p> <p>12 Q Do you recall what that relationship was?</p> <p>13 A No. I mean, I don't recall. Yeah.</p> <p>14 Q Do you recall anything that Mr. Young or any</p> <p>15 entity with whom he was affiliated did in connection</p> <p>16 with the Synapse Foundation?</p> <p>17 MR. GINSBERG: Objection. Assumes</p> <p>18 facts not in evidence.</p> <p>19 BY MR. HELLER:</p> <p>20 Q You can answer.</p> <p>21 MR. GINSBERG: The relationship could</p> <p>22 be personal as well as professional, business as well</p> <p>23 as non-business.</p> <p>24 BY MR. HELLER:</p> <p>25 Q Only in the business context.</p>	<p style="text-align: right;">Page 57</p> <p>1 N. SPANOS</p> <p>2 anyway.</p> <p>3 BY MR. HELLER:</p> <p>4 Q Was Young the creative director of the</p> <p>5 Synapse Foundation?</p> <p>6 A No.</p> <p>7 Q Was Young the creative director of Zap.org?</p> <p>8 A Has he called himself that? Is that your</p> <p>9 question?</p> <p>10 MR. GINSBERG: The question is --</p> <p>11 THE WITNESS: Was he?</p> <p>12 MR. GINSBERG: -- as an official title,</p> <p>13 was he the creative director of Synapse --</p> <p>14 THE WITNESS: There was no</p> <p>15 organizational chart to Zap.org and anyone calling the</p> <p>16 Belarusians or some could get it changed. People</p> <p>17 would change stuff, put whatever they want on there.</p> <p>18 I think I found myself as the --</p> <p>19 MR. GINSBERG: Nick.</p> <p>20 THE WITNESS: I'm sorry.</p> <p>21 MR. GINSBERG: Did Young have the title</p> <p>22 of creative director of Zap.org?</p> <p>23 THE WITNESS: I'm not sure.</p> <p>24 MR. GINSBERG: Yes or no?</p> <p>25 THE WITNESS: I'm not sure. That's the</p>

15 (Pages 54 - 57)

Page 58

1 N. SPANOS
 2 answer.
 3 MR. GINSBERG: Not whether he gave it
 4 to himself. As a matter of organization, did he have
 5 that title?
 6 THE WITNESS: No. I mean, I see it
 7 here on the paper.
 8 MR. GINSBERG: Nick, that's not the
 9 question.
 10 THE WITNESS: That's what that says.
 11 MR. GINSBERG: That's not the question,
 12 whether it's on that piece of paper or not.
 13 THE WITNESS: Oh. Oh.
 14 MR. GINSBERG: Based on your knowledge
 15 of Zap.org, did he -- was he the creative director?
 16 THE WITNESS: I'm not sure.
 17 BY MR. HELLER:
 18 Q Who would know whether or not Ben Young was
 19 the creative director of Zap.org or of the Synapse
 20 Foundation?
 21 A I don't know. Iorgos? I don't know.
 22 Q Who on behalf of the Synapse Foundation --
 23 A I've got to pee again.
 24 Q -- makes a decision on who is involved in
 25 providing services for the Synapse Foundation. Strike

Page 59

1 N. SPANOS
 2 that.
 3 A Say it --
 4 Q I'll ask it another way. You mentioned an
 5 organizational chart.
 6 A No.
 7 Q Is there an organizational -- no?
 8 A I'm sorry.
 9 MR. GINSBERG: There's no
 10 organizational chart. That was his testimony.
 11 MR. HELLER: Okay.
 12 MR. GINSBERG: It's already been asked
 13 and answered.
 14 BY MR. HELLER:
 15 Q Did the Synapse Foundation perform an
 16 initial coin offering?
 17 A So, yeah.
 18 Q Were there documents prepared in connection
 19 with the initial coin offering of the Synapse
 20 Foundation?
 21 A Probably.
 22 Q Who prepared those documents?
 23 A I mean, that'd be on the website, no?
 24 MR. GINSBERG: Nick, who prepared them,
 25 if you know?

Page 60

1 N. SPANOS
 2 THE WITNESS: It's too broad a
 3 question.
 4 BY MR. HELLER:
 5 Q Were there attorneys involved in connection
 6 with the initial coin offering of the Synapse
 7 Foundation?
 8 A Yes.
 9 Q What are the names of those attorneys?
 10 A I don't know.
 11 Q Do you have any --
 12 A I don't remember.
 13 Q Do you --
 14 A I probably would have known at one point.
 15 Q Are there any documents that would refresh
 16 your recollection as to the attorneys who prepared the
 17 documents for the initial coin offering of the Synapse
 18 Foundation?
 19 A What does document mean? Paper?
 20 Q A piece of paper.
 21 A Paper? I don't think so. I don't have any.
 22 Q Were there any electronic --
 23 A Probably.
 24 Q Any who would have access to the electronic
 25 filings or documents relating to the initial coin

Page 61

1 N. SPANOS
 2 offering for the Synapse Foundation?
 3 A That would be -- Denmark or Isle of Man or
 4 Switzerland.
 5 Q Did you have access to any documents,
 6 electronic documents in connection with the initial
 7 coin offering of the Synapse Foundation?
 8 A See, the issue is my eyesight was much, much
 9 worse. I had many surgeries. I have a retinal -- I
 10 have uveitis and retinal vasculitis. And they put
 11 pellets in my eyes. And I've had many surgeries. And
 12 documents were not that good to me because I can't
 13 really see that well.
 14 So it's a little difficult to recollect the
 15 -- you know, either someone read it to me or it was
 16 sent to someone else. I don't know. I don't
 17 remember. Or we were there.
 18 Q Did you have access to the electronic
 19 documents? I didn't ask whether you read them. I
 20 just want to know whether you had access.
 21 A Oh. I can't say to all of them because I'm
 22 not sure. But maybe.
 23 Q Okay. Did you make any attempt to get those
 24 electronic documents and give them to your attorney?
 25 A I don't remember. Which attorney?

16 (Pages 58 - 61)

Page 62

1 N. SPANOS

2 Q Mr. Ginsberg,

3 A No.

4 MR. GINSBERG: Objection. I think that

5 calls for attorney-client privilege.

6 MR. HELLER: No. It doesn't.

7 MR. GINSBERG: And you're also assuming

8 facts not in evidence.

9 BY MR. HELLER:

10 Q Answer the question.

11 MR. GINSBERG: If you want to start

12 with the basic question does Mr. Spanos have access to

13 those records now, then we can see where that goes.

14 But you're assuming he has access in asking that

15 question.

16 MR. HELLER: He answered the question.

17 And I did.

18 THE WITNESS: No. Can I go to the

19 bathroom?

20 MR. HELLER: Go to the bathroom.

21 THE WITNESS: Please? I drank too

22 much.

23 COURT REPORTER: Going off the record.

24 The time now is 11:53 a.m.

25 (Off the record.)

Page 63

1 N. SPANOS

2 COURT REPORTER: We're back on the

3 record. The time now is 11:58 p.m. -- 11:58 a.m. and

4 I'm going to read back the last portion.

5 THE WITNESS: What time is it? I've

6 got to take my medicine. Do you know what time it is?

7 MR. GINSBERG: Noon. Noon.

8 THE WITNESS: Oh, we've got to get out

9 of here in 24 minutes.

10 (The reporter replayed the record as

11 requested.)

12 MR. HELLER: You know what, let him

13 just clarify what he wanted to say.

14 MR. GINSBERG: Did you want to clarify

15 your last answer?

16 THE WITNESS: You asked if I ever gave

17 -- I don't know. What was the question? You said

18 something about giving to Mr. Ginsberg or something,

19 giving papers to Mr. Ginsberg.

20 Well, there's no way I gave them to Mr.

21 Ginsberg because I didn't have any papers. So I said

22 no. And then I had to go to the bathroom. And I had

23 to go to the bathroom before. I was holding it in.

24 But anyway. Anyway.

25 BY MR. HELLER:

Page 64

1 N. SPANOS

2 Q Who from the Synapse Foundation has access

3 to electronic files of the Synapse Foundation?

4 MR. GINSBERG: Objection. Assumes

5 facts not in evidence.

6 BY MR. HELLER:

7 Q Is there anyone from the Synapse Foundation

8 that has access to electronic files of the Synapse

9 Foundation?

10 MR. GINSBERG: If you know.

11 MR. HELLER: Hmm?

12 MR. GINSBERG: If he knows.

13 MR. HELLER: Mm-hmm.

14 THE WITNESS: I'm not sure.

15 BY MR. HELLER:

16 Q Are you currently a director of the Synapse

17 Foundation?

18 A No.

19 Q Do you play any role whatsoever currently in

20 connection with the Synapse Foundation?

21 A Well, there haven't been any phone calls for

22 a long time, so.

23 Q When was the last time there was a phone

24 call?

25 A I don't know. A while ago.

Page 65

1 N. SPANOS

2 Q And who was that phone call with, the last

3 phone call?

4 A Clufetos.

5 Q Anyone else?

6 A It was a long time ago.

7 Q Is there anyone from the Synapse Foundation

8 who would have access to the electronic or paper

9 documents relating to the initial coin offering of the

10 Synapse Foundation?

11 MR. GINSBERG: Objection as to form.

12 Calls for -- a hypothetical question. Calls for

13 speculation.

14 BY MR. HELLER:

15 Q If you know the answer, you can answer.

16 A Say it again?

17 Q Do you know who from the Synapse Foundation

18 would have access to the electronic files or paper

19 files of the Synapse Foundation?

20 MR. GINSBERG: Objection to form.

21 THE WITNESS: I told you I don't know.

22 BY MR. HELLER:

23 Q Do you know if there is anyone currently

24 involved in the running of the Synapse Foundation?

25 A The people we said before.

17 (Pages 62 - 65)

<p style="text-align: right;">Page 66</p> <p>1 N. SPANOS</p> <p>2 Q Who are those people?</p> <p>3 A I mean, it's -- I told you. Clufetos. I</p> <p>4 forgot this guy's name. I don't know. The Danish</p> <p>5 guy. I forgot his name. I don't know. There's</p> <p>6 another person, two more people I don't remember.</p> <p>7 One's like Tabby, Tabitha something.</p> <p>8 Tabitha something. I don't know the last name. Okay?</p> <p>9 I don't. I mean, you know, it took me a long time to</p> <p>10 remember Herskowitz's name.</p> <p>11 Q When was the last time --</p> <p>12 A I don't think that way. I'm sorry.</p> <p>13 Q When was the last time you or any entity</p> <p>14 that you were affiliated with performed any</p> <p>15 compensated or uncompensated services for the Synapse</p> <p>16 Foundation?</p> <p>17 A Say that again.</p> <p>18 Q When was the last time you or an individual</p> <p>19 -- or an entity with which you were affiliated</p> <p>20 performed any compensated or uncompensated services on</p> <p>21 behalf of the Synapse Foundation?</p> <p>22 A A few months ago. I mean, probably a few</p> <p>23 months ago.</p> <p>24 Q What were those services?</p> <p>25 A I don't know. Tweeting. I mean, you have</p>	<p style="text-align: right;">Page 68</p> <p>1 N. SPANOS</p> <p>2 MR. HELLER: Yeah. Where does he spend</p> <p>3 the majority of his time?</p> <p>4 BY MR. HELLER:</p> <p>5 Q More than 51 percent of your time, are you</p> <p>6 in New York City, are you on the road, are you --</p> <p>7 MR. GINSBERG: Just one minute.</p> <p>8 Objection. Assumes facts not in evidence. Assumes</p> <p>9 Mr. Spanos is any place 51 percent of his time.</p> <p>10 MR. HELLER: Well, he could tell me so.</p> <p>11 MR. GINSBERG: Well, if you ask the</p> <p>12 proper question, he could respond properly.</p> <p>13 BY MR. HELLER:</p> <p>14 Q Mr. Spanos, where do you reside?</p> <p>15 A In New York City.</p> <p>16 Q Do you maintain an office in New York City?</p> <p>17 A No.</p> <p>18 Q Where do you maintain an office?</p> <p>19 MR. GINSBERG: Objection. Assumes</p> <p>20 facts not in evidence.</p> <p>21 BY MR. HELLER:</p> <p>22 Q Do you have an office?</p> <p>23 A Me?</p> <p>24 Q Yes.</p> <p>25 A No. I don't think so.</p>
<p style="text-align: right;">Page 67</p> <p>1 N. SPANOS</p> <p>2 to understand that there's a community of people that,</p> <p>3 you know, do things without any permission or --</p> <p>4 Q So you --</p> <p>5 A -- guidance or anything. There's a whole</p> <p>6 community of software holders. I mean, you're calling</p> <p>7 it ICO whatever. But it's software.</p> <p>8 Q Did you have permission to perform those</p> <p>9 services when you performed them?</p> <p>10 A I had -- at their request. Yeah. It wasn't</p> <p>11 even permission. It was --</p> <p>12 Q And who made the request?</p> <p>13 A I think it was Clufetos.</p> <p>14 Q And how was that request made?</p> <p>15 A One of the auditory apps.</p> <p>16 Q Where were you when that request was made?</p> <p>17 A I don't really remember.</p> <p>18 Q Where do you spend the majority of your</p> <p>19 time?</p> <p>20 A I'm on the road a lot, all over.</p> <p>21 Q Where do you spend the majority of your</p> <p>22 team?</p> <p>23 MR. GINSBERG: You mean New York as</p> <p>24 opposed to on the road or is he in New York more than</p> <p>25 he's in the Isle of Man or --</p>	<p style="text-align: right;">Page 69</p> <p>1 N. SPANOS</p> <p>2 Q Do you work -- do you currently work for a</p> <p>3 company or an entity?</p> <p>4 MR. GINSBERG: Do you get a W-2 or a</p> <p>5 1044 from any company?</p> <p>6 THE WITNESS: No.</p> <p>7 BY MR. HELLER:</p> <p>8 Q Do you get a 1099 from any company?</p> <p>9 A This questioning --</p> <p>10 MR. GINSBERG: 1099.</p> <p>11 THE WITNESS: No. I don't think so. I</p> <p>12 don't know yet. I hope so.</p> <p>13 MR. GINSBERG: Just answer the</p> <p>14 question.</p> <p>15 THE WITNESS: I just -- I'm trying to</p> <p>16 answer, you know, factually.</p> <p>17 BY MR. HELLER:</p> <p>18 Q Last year in --</p> <p>19 A Oh, last year.</p> <p>20 Q 2018, did you get a 1099 from any company?</p> <p>21 A Not yet.</p> <p>22 Q In 2018, did you maintain an ownership in</p> <p>23 any entity?</p> <p>24 A Yes.</p> <p>25 Q Which entities did you maintain an ownership</p>

18 (Pages 66 - 69)

Page 70

1 N. SPANOS
2 in?
3 A Oh, I don't know. A lot of them.
4 Q Okay. Do you maintain an ownership in
5 Blockchain Technologies?
6 A No.
7 Q In 2018, you did not maintain an ownership
8 interest in Blockchain Technologies?
9 A No.
10 Q In 2018, did any entity with whom you --
11 A He's not saying the name of the company
12 right.
13 MR. HERSKOWITZ: Blockchain
14 Technologies Corporation.
15 BY MR. HELLER:
16 Q In 2018, did you maintain an ownership
17 interest in Blockchain Technologies Corporation?
18 A Yes. You're saying -- you said with a Y.
19 That's another company, Blockchain Technology. That's
20 --
21 Q I said technologies.
22 A Well, I didn't hear it. And then you didn't
23 say corporation. There's a lot of them. It's a very
24 -- there's a lot of companies with that name.
25 Q In 2018, did Blockchain Technologies

Page 71

1 N. SPANOS
2 maintain an office --
3 A I mean, if I didn't want to tell you, I
4 wouldn't have brought up the -- I'm trying to help you
5 ask me the question correctly.
6 Q That's fine. That's fine. In 2018, did
7 Blockchain Technologies Corporation have an office?
8 A Yes. Wait, 2009?
9 Q '18.
10 A '18. Yes.
11 Q Where was that office?
12 A There was a couple of places used. What
13 does Blockchain Technologies have to do with this?
14 Q Answer the question, please.
15 A I thought this was Zap.
16 Q Answer the question, please.
17 MR. GINSBERG: Just answer then.
18 THE WITNESS: Yeah. I had an office at
19 55 Wall Street. I think that's the address.
20 BY MR. HELLER:
21 Q Now you mentioned previously that in 2018
22 you resided -- strike that. You mentioned previously
23 that you reside in New York City and that you had an
24 office for Blockchain Technologies in New York City.
25 When you were asked to perform services on behalf of

Page 72

1 N. SPANOS
2 the Synapse group --
3 A Yeah.
4 Q -- was it performed at the place you resided
5 or out of the place you worked in New York City?
6 MR. GINSBERG: Objection. I don't have
7 any idea what that question means.
8 MR. HELLER: Well, if he understands
9 it, he can answer.
10 THE WITNESS: I don't know what he
11 means. Can you say it again?
12 BY MR. HELLER:
13 Q When you were asked to perform services for
14 the Synapse Foundation a few months ago --
15 A Yes.
16 Q -- was it out of your office in New York
17 City that you performed those services?
18 MR. GINSBERG: Objection. There was no
19 testimony that he performed any services.
20 MR. HELLER: Yes. There was.
21 MR. GINSBERG: No. There was testimony
22 that he was asked to perform services.
23 MR. HELLER: And he said he did.
24 MR. GINSBERG: I don't believe that's
25 correct. Ask him the question. Don't stare at me.

Page 73

1 N. SPANOS
2 THE WITNESS: He's angry, this guy.
3 BY MR. HELLER:
4 Q Mr. Spanos, you were asked to perform
5 services a few months ago on behalf of the Synapse
6 Foundation.
7 A Yeah.
8 Q Did you perform services on behalf of the
9 Synapse Foundation?
10 A Me? Or I don't understand the question.
11 MR. GINSBERG: You're being asked in
12 your individual capacity if you performed services for
13 Synapse Foundation a few months ago. And the answer
14 is yes or --
15 THE WITNESS: Paid or unpaid? Yeah.
16 BY MR. HELLER:
17 Q Okay. And where did you perform those
18 services?
19 A I don't know where I was at the time. You
20 mean physically, in a three-dimensional world?
21 Q Yes. In a three-dimensional world.
22 A I'm not sure. In 20 -- what year, '18? I
23 think I --
24 Q You said a few months ago you were asked to
25 perform services.

<p style="text-align: right;">Page 74</p> <p>1 N. SPANOS</p> <p>2 A Oh, a few months ago. I don't remember</p> <p>3 where I was.</p> <p>4 Q When you were asked to perform the services</p> <p>5 for the Synapse Foundation a few months ago, what were</p> <p>6 you asked to do?</p> <p>7 A I don't remember. I think something,</p> <p>8 something to do with communication.</p> <p>9 Q Communication with whom?</p> <p>10 A Just communication, like to the public or</p> <p>11 something.</p> <p>12 Q And did you communicate to the public?</p> <p>13 A I don't remember. Probably -- can I -- I</p> <p>14 don't know. Can I ask someone? I mean, I don't</p> <p>15 remember.</p> <p>16 Q Well, who would you ask?</p> <p>17 A I would ask if I did work -- I think it was</p> <p>18 supposed to be a tweet or something I think. I don't</p> <p>19 remember. I would ask probably the Danish guy or</p> <p>20 Clufetos or someone.</p> <p>21 Q Are you familiar with Satoshi Square?</p> <p>22 A Yeah.</p> <p>23 Q What is Satoshi Square?</p> <p>24 A Satoshi Square is a group of people that</p> <p>25 meet and trade bitcoin.</p>	<p style="text-align: right;">Page 76</p> <p>1 N. SPANOS</p> <p>2 Square is. I'm entitled to ask me about Satoshi</p> <p>3 Square. And when he tells me about it, I'll follow up</p> <p>4 with the appropriate questions.</p> <p>5 BY MR. HELLER:</p> <p>6 Q Go.</p> <p>7 MR. GINSBERG: Mr. Heller, first of</p> <p>8 all, don't talk to my client that way.</p> <p>9 MR. HELLER: I'm talking to you that</p> <p>10 way.</p> <p>11 MR. GINSBERG: Don't give -- excuse me?</p> <p>12 MR. HELLER: I was talking to you that</p> <p>13 way, not your client.</p> <p>14 MR. GINSBERG: Go was directed towards</p> <p>15 me?</p> <p>16 MR. HELLER: Go was directed to your</p> <p>17 client. I apologize for that.</p> <p>18 BY MR. HELLER:</p> <p>19 Q Go. Speak.</p> <p>20 MR. GINSBERG: We would not step</p> <p>21 outside and discuss how to respond to your inquiry.</p> <p>22 That's a totally inappropriate suggestion. It is</p> <p>23 beneath you. And I'm surprised you would even suggest</p> <p>24 that. If you're representing to me in good faith that</p> <p>25 Satoshi Square has a connection to whether Zap.org</p>
<p style="text-align: right;">Page 75</p> <p>1 N. SPANOS</p> <p>2 Q How often do they meet?</p> <p>3 MR. GINSBERG: Objection. This is --</p> <p>4 THE WITNESS: I have no idea.</p> <p>5 MR. GINSBERG: Wait, wait, wait, wait.</p> <p>6 Stop. Please slow down. If you can make a proffer as</p> <p>7 to why this has anything to do with Zap --</p> <p>8 MR. HELLER: I don't have to make a</p> <p>9 proffer.</p> <p>10 MR. GINSBERG: Excuse me. Stop</p> <p>11 interrupting me, please. This deposition is limited</p> <p>12 to whether there is jurisdiction with regard to</p> <p>13 Zap.org.</p> <p>14 MR. HELLER: Mm-hmm.</p> <p>15 MR. GINSBERG: All right. And I'm</p> <p>16 asking you for a proffer as to how this is related to</p> <p>17 that specific limited inquiry. If you're not going to</p> <p>18 do it, I'm going to direct my client not to answer.</p> <p>19 That's not right. You're taking --</p> <p>20 MR. HELLER: Absolutely not because if</p> <p>21 I do make a proffer, then you and he could go outside</p> <p>22 and discuss what the answer is and come back and tell</p> <p>23 me what and what not.</p> <p>24 MR. GINSBERG: Mr. Heller.</p> <p>25 MR. HELLER: He knows what Satoshi</p>	<p style="text-align: right;">Page 77</p> <p>1 N. SPANOS</p> <p>2 does or does not have an existence or jurisdiction or</p> <p>3 whether there is New York jurisdiction over Zap.org,</p> <p>4 I'll allow my client to respond.</p> <p>5 MR. HELLER: Thank you.</p> <p>6 MR. GINSBERG: But I'd like that good</p> <p>7 faith proffer representation from you.</p> <p>8 MR. HELLER: I will make a good faith</p> <p>9 representation that I have found a connection, at</p> <p>10 least online, between Satoshi Square and Zap.org</p> <p>11 and/or the Synapse Foundation.</p> <p>12 MR. GINSBERG: Okay.</p> <p>13 MR. HELLER: So I would like to ask</p> <p>14 your client questions about that.</p> <p>15 MR. GINSBERG: Okay.</p> <p>16 MR. HELLER: Thank you.</p> <p>17 THE WITNESS: So like I said, what's</p> <p>18 the question?</p> <p>19 BY MR. HELLER:</p> <p>20 Q What is Satoshi -- you said you are familiar</p> <p>21 with Satoshi Square.</p> <p>22 A Yeah.</p> <p>23 Q How are you familiar with Satoshi Square?</p> <p>24 A I said it's people who meet and trade</p> <p>25 bitcoin or talk about bitcoin.</p>

20 (Pages 74 - 77)

<p style="text-align: right;">Page 78</p> <p>1 N. SPANOS</p> <p>2 Q And do you know whether the Synapse</p> <p>3 Foundation and/or Zap.org has any connection with</p> <p>4 Satoshi Square?</p> <p>5 A I don't think so. If they were -- you know,</p> <p>6 I don't know.</p> <p>7 MR. GINSBERG: Don't -- don't guess.</p> <p>8 THE WITNESS: Yeah. I don't -- I don't</p> <p>9 -- I don't know. It's not that I don't remember. I</p> <p>10 don't know.</p> <p>11 BY MR. HELLER:</p> <p>12 Q So do you play any role currently in</p> <p>13 connection with any marketing of Zap.org and/or the</p> <p>14 Synapse Foundation?</p> <p>15 MR. GINSBERG: Objection. Assumes</p> <p>16 facts not in evidence, whether Zap and Synapse, or</p> <p>17 Synapse does any marketing.</p> <p>18 BY MR. HELLER:</p> <p>19 Q Does Zap.org and/or Synapse do any marketing</p> <p>20 on behalf of that entity?</p> <p>21 A I don't know what market -- what you mean.</p> <p>22 You know, marketing, what does that mean?</p> <p>23 Q Does it do anything to promote itself?</p> <p>24 A What does that mean?</p> <p>25 Q Advertisements.</p>	<p style="text-align: right;">Page 80</p> <p>1 N. SPANOS</p> <p>2 technology and explain the incredible technology to</p> <p>3 people. And I mean, I don't know what the definition</p> <p>4 of spokesperson is because I'm not really from that</p> <p>5 world, you know? I'm usually behind a computer all</p> <p>6 the time.</p> <p>7 But I explain the technology pretty much.</p> <p>8 If you're asking me what my duties are, I explain the</p> <p>9 technology and that's what I do.</p> <p>10 Q Do you make any decisions relating to the</p> <p>11 hiring or firing of anyone associated with the Synapse</p> <p>12 Foundation?</p> <p>13 A No.</p> <p>14 Q Who -- do you know who from the Synapse</p> <p>15 Foundation makes the decisions regarding the firing or</p> <p>16 firing?</p> <p>17 A Nobody. There's no one hired. I don't</p> <p>18 think you understand what these things are. It's not</p> <p>19 what you think it is. You think it's like a regular</p> <p>20 company or something like that. You just don't</p> <p>21 understand what it is.</p> <p>22 It's a bunch of people. And if they own the</p> <p>23 software, you know, they make recommendations. And</p> <p>24 somehow there's a consensus reached and there's</p> <p>25 thousands and thousands of people that own it. So I</p>
<p style="text-align: right;">Page 79</p> <p>1 N. SPANOS</p> <p>2 A I don't know if it does -- you mean paid</p> <p>3 advertisement? I don't know.</p> <p>4 Q Okay. Currently what role if anything do</p> <p>5 you play --</p> <p>6 A I'm like --</p> <p>7 MR. GINSBERG: Wait, wait. Let him</p> <p>8 finish question.</p> <p>9 BY MR. HELLER:</p> <p>10 Q -- on behalf of the Synapse Foundation?</p> <p>11 THE WITNESS: Okay.</p> <p>12 MR. GINSBERG: Listen. Take your time.</p> <p>13 THE WITNESS: All right. I want to</p> <p>14 give him his answers fast --</p> <p>15 BY MR. HELLER:</p> <p>16 Q What role do you play --</p> <p>17 A -- because I'm frightened of this guy.</p> <p>18 Q What role, if any, do you play on behalf of</p> <p>19 the Synapse Foundation today?</p> <p>20 A Okay. So I'm ad hoc spokesperson. I mean,</p> <p>21 I've never -- like I said, I don't think -- you know,</p> <p>22 there's no organizational chart that I know of. So</p> <p>23 I'm a spokesperson because I'm visible in the</p> <p>24 community.</p> <p>25 I make suggestions on the incredible</p>	<p style="text-align: right;">Page 81</p> <p>1 N. SPANOS</p> <p>2 don't think you understand how it works.</p> <p>3 You're trying to -- you're trying for me to</p> <p>4 express to you some corporate structure. It doesn't</p> <p>5 work that way. And there's thousands of these types</p> <p>6 of projects. And none of them work that way.</p> <p>7 So I don't know if you want a lesson. In</p> <p>8 that I can explain, you know? But that's -- I don't</p> <p>9 think you understand what it is.</p> <p>10 Q Well, maybe it'll speed things along if you</p> <p>11 can explain it to me.</p> <p>12 MR. GINSBERG: Don't -- don't --</p> <p>13 THE WITNESS: I charge a lot of money.</p> <p>14 MR. GINSBERG: If there are questions</p> <p>15 for --</p> <p>16 THE WITNESS: -- for that, a lot.</p> <p>17 MR. HELLER: Mark that as Spanos B</p> <p>18 (Exhibit Spanos B was marked for</p> <p>19 identification.)</p> <p>20 THE WITNESS: So if I go to the</p> <p>21 bathroom by myself, would you not be angry? I really</p> <p>22 go to the bathroom a lot. I'm on medicine for</p> <p>23 hypertension.</p> <p>24 MR. HELLER: Mr. Spanos, it's not</p> <p>25 personal.</p>

21 (Pages 78 - 81)

Page 82

1 N. SPANOS
 2 THE WITNESS: I don't need a conference
 3 or anything. I need to go to the bathroom a lot.
 4 MR. HELLER: That's fine. I apologize
 5 for suggesting that --
 6 THE WITNESS: So my lawyer can stray
 7 here.
 8 MR. HELLER: No, no. Your lawyer I
 9 trust implicitly.
 10 BY MR. HELLER:
 11 Q Mr. Spanos -- and by the way, if you do need
 12 to go to the bathroom, don't worry about it.
 13 A Thank you. Thank you.
 14 MR. GINSBERG: Do you have a copy of
 15 what you're showing him?
 16 MR. HELLER: Yes.
 17 THE WITNESS: Oh yeah, right there. 55
 18 Wall Street.
 19 MR. GINSBERG: And just wait -- thank
 20 you.
 21 THE WITNESS: Wow.
 22 BY MR. HELLER:
 23 Q Mr. Spanos, I've placed before you three
 24 documents Bates-stamped BTC_000991 through BTC_000993.
 25 And they appear to be invoices to Synapse Foundation

Page 83

1 N. SPANOS
 2 by Blockchain Technologies Corp.
 3 A Yeah.
 4 Q And they were produced by your counsel in
 5 connection with this lawsuit. Do you recognize these
 6 documents, these three pages?
 7 A I don't recognize the exact document. But I
 8 can attest. I don't know. I can probably -- yeah,
 9 whatever. I loosely recognize it.
 10 Q Okay.
 11 A I don't know that it's -- yeah.
 12 Q In your at least recognition of the
 13 documents, do you have an understanding of what these
 14 three documents relate to?
 15 A I think so. Yeah. I think so.
 16 Q Please let me finish the question before you
 17 answer.
 18 A Oh, I'm sorry.
 19 Q What do these three documents relate to?
 20 A I believe it was the foundation hired out
 21 Blockchain.
 22 Q To do what?
 23 A I don't -- it doesn't say. I don't know.
 24 Q It says --
 25 A I don't remember.

Page 84

1 N. SPANOS
 2 Q In the middle of the first page, it says
 3 advance for ongoing work and expenses.
 4 A Oh, so I don't know.
 5 Q What ongoing work?
 6 A Well, like coding or something like that.
 7 I'm not sure.
 8 Q Do you know who from the foundation, an
 9 individual, hired Blockchain on behalf of Synapse
 10 Foundation?
 11 A Well, you know, that was a fight because,
 12 you know, they had cheaper labor elsewhere in Poland
 13 and Yugoslavia -- not Yugoslavia. Belorussia and
 14 Armenia. Cheaper labor.
 15 And it was a fight to even get it to this
 16 coding house here, whatever. If this was for coding,
 17 I'm not sure where it was in the timeline. I don't
 18 know.
 19 Q Do you know who from Synapse Foundation --
 20 A Yeah.
 21 Q -- hired Blockchain Technologies Corp. for
 22 ongoing --
 23 A Well, like I said, it was an argument --
 24 MR. GINSBERG: Let him finish the
 25 question.

Page 85

1 N. SPANOS
 2 THE WITNESS: I'm sorry.
 3 BY MR. HELLER:
 4 Q For ongoing work and to pay expenses.
 5 A What? Ongoing work and what?
 6 Q And expenses.
 7 A Where does it say that? It says that?
 8 Q Yes. It does.
 9 MR. GINSBERG: Objection. Assumes
 10 ongoing work.
 11 THE WITNESS: No. It says right here
 12 advance ongoing work and expenses.
 13 MR. GINSBERG: Oh, I'm sorry.
 14 THE WITNESS: There was a consensus
 15 somehow and, you know, there was an argument. But
 16 they wanted cheaper European or Asian work.
 17 BY MR. HELLER:
 18 Q Who is they?
 19 A So they gave some to us.
 20 Q Who was the consensus with?
 21 A People on the phone call.
 22 Q Who were on the phone call?
 23 A I don't remember. What date is this? Oh,
 24 2018. I still don't remember. February. I don't
 25 remember.

22 (Pages 82 - 85)

Page 86

1 N. SPANOS

2 Q Was work performed by Blockchain

3 Technologies for Synapse Foundation?

4 A Yeah.

5 Q What type of work was performed?

6 A So Synapse Foundation hired Blockchain

7 Technologies to do work. I'm not sure exactly what

8 this invoice is for, what part of the work.

9 But different types of, I don't know, like

10 coding maybe on the backend, some encryption maybe.

11 I'm not sure. I don't remember the exact work. That

12 should be -- I don't know.

13 Q Did Synapse Foundation pay for the work?

14 A Yes. Right there.

15 Q At the time Synapse Foundation engaged

16 Blockchain Technologies to perform work for it, did

17 you have a role with Blockchain Technologies

18 Corporation?

19 A I was lobbying for Blockchain Technologies.

20 I was lobbying the foundation for Blockchain

21 Technologies to get some work.

22 Q Did you hold a position at that time with

23 Blockchain Technologies Corporation?

24 A Yes.

25 Q What was that position?

Page 87

1 N. SPANOS

2 A I don't know. The boss. I don't know.

3 What was it? Shareholder? I'm not sure.

4 Q Were you chief --

5 A I don't know what it is. You know, I don't

6 know.

7 Q Do you recall whether you were chief

8 executive officer at that time?

9 A You know what? It probably says that in a

10 lot of places. And I'm not sure what the textbook

11 definition of chief executive officer is. People

12 might think I'm a businessman. But I'm more a

13 technologist.

14 Q Do you recall how Synapse Foundation paid

15 for the services, whether it was wire, check?

16 A I don't recall.

17 Q Turning your attention to the third page --

18 A I think we're done. It's been two hours.

19 I've got to go to the bathroom.

20 Q You want to go before I ask the next

21 question?

22 A I'd like to go to the bathroom.

23 Q Okay.

24 A So we're going off the record here?

25 Q Yes.

Page 88

1 N. SPANOS

2 COURT REPORTER: Going off the record.

3 The time now is 12:28 p.m.

4 (Off the record.)

5 COURT REPORTER: We're back on the

6 record. The time now is 12:36 p.m.

7 BY MR. HELLER:

8 Q Okay. Mr. Spanos, you had previously

9 mentioned that you're familiar with Satoshi Square.

10 A Yeah.

11 Q Have you ever spoken at Satoshi Square?

12 A Sure.

13 Q Okay. How often do you speak at Satoshi

14 Square?

15 A Oh, I don't know. I don't know.

16 Q More than once a year?

17 A I don't know. Sometimes.

18 Q Okay. And have you spoken in Satoshi Square

19 in 2020?

20 A 2020?

21 Q Mm-hmm.

22 A I don't think so.

23 Q Did you speak at Satoshi Square in 2019?

24 A Listen, can I define Satoshi Square to you

25 better? Because --

Page 89

1 N. SPANOS

2 Q Sure.

3 A Okay. So Satoshi Square is a bunch of guys.

4 And they don't even -- you know, a lot of them don't

5 even have their real name. And they show up and they

6 trade.

7 So when you say did I speak at Satoshi

8 Square, does that mean that I -- was I distinguished,

9 you know, these guys, they hate each other. They hate

10 everyone. I don't know what that means. Was I --

11 Q Have you been someone for whom an

12 advertisement --

13 MR. GINSBERG: Wait a minute. Were you

14 done, Nick?

15 THE WITNESS: Hmm?

16 MR. HELLER: Were you done? I'm sorry.

17 I interrupted you.

18 MR. GINSBERG: Were you done with your

19 answer?

20 BY MR. HELLER:

21 Q Were you done with your answer?

22 A I'm just saying he thinks like -- I don't

23 know what he thinks Satoshi Square is. Satoshi Square

24 is a bunch of random people that -- not random. It

25 comes from a group of people that were early bitcoin

Page 90

1 N. SPANOS
 2 traders. We used to trade in the park under Lincoln.
 3 I think it was Lincoln statue in the north of Union
 4 Square Park. Which statue is that?
 5 MR. GINSBERG: Keep going, Nick.
 6 THE WITNESS: And then we traded in
 7 Whole Foods. And the guy that runs it -- ran that, I
 8 don't know. In the beginning, there was like a meetup
 9 or something and there was some guy in Panama. Ross.
 10 Ross. Ross. I don't know. Ross. Ross. And --
 11 BY MR. HELLER:
 12 Q Do you know where Satoshi Square is located?
 13 A Nowhere and everywhere.
 14 Q When you --
 15 A It's a decentralized thing. So we're
 16 decentralists by definition.
 17 Q Do individuals ever meet up in a particular
 18 location?
 19 A We used to meet up in the north of Union
 20 Square in New York City where it started in like 2012,
 21 2011, 2012, 2013.
 22 Q Are you familiar with --
 23 A Early 2013, late 2012.
 24 Q Are you familiar with a location called 45
 25 Mott Street in Basement?

Page 91

1 N. SPANOS
 2 A Oh, yeah. Yeah.
 3 Q And the individuals that make up Satoshi
 4 Square ever meet -- have they ever met at 45 Mott
 5 Street in the Basement?
 6 A I think so. Yeah.
 7 Q Okay. And have they met there more than
 8 once?
 9 A Yeah.
 10 Q Have they met there -- do you recall whether
 11 they met there --
 12 A This is not in the beginning of Satoshi
 13 Square when -- you know, in the -- you're saying just
 14 the -- what year is that?
 15 Q 2019.
 16 A Yeah. Okay.
 17 Q Were there events at Satoshi Square ever
 18 sponsored by Zap --
 19 A The 45 --
 20 MR. GINSBERG: Nick, you've got to let
 21 him finish.
 22 THE WITNESS: I'm sorry.
 23 BY MR. HELLER:
 24 Q Were there events or meetups in Satoshi
 25 Square ever sponsored by Zap.org?

Page 92

1 N. SPANOS
 2 A It's hard to say. I mean, it depends what
 3 your definition of sponsored is. Did they buy drinks?
 4 Did they -- I don't know. You know what I mean? What
 5 do you mean?
 6 Q Did they buy drinks?
 7 A Probably.
 8 Q Did they buy food?
 9 A I don't think so. Not in 2019.
 10 Q Prior to 2019, did Zap.org buy food for
 11 meetups at Satoshi Square?
 12 A I don't think so.
 13 Q How many times did Zap.org sponsor a meetup?
 14 A I don't know.
 15 Q Was it more than once?
 16 MR. GINSBERG: Let him finish his
 17 question.
 18 THE WITNESS: I'm sorry.
 19 BY MR. HELLER:
 20 Q Was it more than once?
 21 A I don't remember. Maybe. Because the
 22 reason why I'm answering that way is when people get
 23 together, everybody throws their name on stuff. So if
 24 they threw Zap's name on it, you know what I mean, no
 25 one enforced --

Page 93

1 N. SPANOS
 2 Q Who is they?
 3 MR. GINSBERG: Wait. Were you done
 4 with your answer? No one enforced?
 5 THE WITNESS: Nobody enforced, you
 6 know, loose, decentralized type people. No one
 7 enforced, oh, you said that you sponsored or whatever.
 8 You didn't give any money.
 9 You know, it was nothing like -- if
 10 there was a meetup, everyone threw their name in to
 11 try to, you know, bring their group of people or
 12 people that followed them or something to bring as
 13 many people to the place as possible. Do you
 14 understand me? It's not like an exclusive thing.
 15 BY MR. HELLER:
 16 Q Are you saying --
 17 A If that's what you're saying, you know --
 18 Q I'm not saying anything.
 19 A Well, I'm sorry. Am I saying what?
 20 Q That the individuals who indicated that
 21 Zap.org was sponsoring an event at Satoshi Square did
 22 not have permission to put Zap.org's name --
 23 A There's no one in charge of Satoshi Square.
 24 It's just a gathering of people. So when people say,
 25 hey, Satoshi Square, all this means, you know, if

<p style="text-align: right;">Page 94</p> <p>1 N. SPANOS</p> <p>2 you're a bitcoiner, show up. Josh Jeffries -- no,</p> <p>3 Josh. I forgot his last name -- used to have creative</p> <p>4 control, creative control. I don't know. Used to</p> <p>5 have a curated thing.</p> <p>6 But this is back six years ago. And he</p> <p>7 moved out of the country. And his -- he, you know --</p> <p>8 and plus, Satoshi Square is all over the world. It's</p> <p>9 like a Toastmasters. How about Toastmasters? I don't</p> <p>10 know what Toastmasters is.</p> <p>11 But if there was a Toastmasters of bitcoin -</p> <p>12 - but Satoshi Square doesn't train you. You know,</p> <p>13 it's not an entity. It's not -- I'm trying to explain</p> <p>14 to you what it is in the real world. You guys have --</p> <p>15 Q Who is Rachel Siegel?</p> <p>16 A Rachel Siegel is an influencer.</p> <p>17 Q Do you know whether she has ever hosted an</p> <p>18 event at Satoshi Square at 45 Mott?</p> <p>19 A So when you say has she ever hosted an</p> <p>20 event, did she have the microphone? Is that what</p> <p>21 you're saying?</p> <p>22 Q It says she's the host, so.</p> <p>23 A Yeah. But did you look up if there were any</p> <p>24 other hosts on the same night? You know what I mean?</p> <p>25 I'm not sure.</p>	<p style="text-align: right;">Page 96</p> <p>1 N. SPANOS</p> <p>2 That happens all the time. Like someone</p> <p>3 asks one foundation. They ask another foundation.</p> <p>4 You know, and then if you have a good name, you might</p> <p>5 be able to get 10 foundations' names. And you would</p> <p>6 get their cryptocurrency sent to you. And they don't</p> <p>7 care where the hell it is as long as, you know, they</p> <p>8 believe that you're going to put their logo somewhere.</p> <p>9 So I'm not sure if I was at that event.</p> <p>10 I've been -- I think they had events there for a long</p> <p>11 time, Satoshi Square for how many -- many times,</p> <p>12 right? And I might have been there twice I think or</p> <p>13 three times. And they might have had them there for I</p> <p>14 don't know how many times.</p> <p>15 Q And on --</p> <p>16 A Dozens. I'm not sure.</p> <p>17 Q And on --</p> <p>18 A I had no control.</p> <p>19 Q No control over?</p> <p>20 A Over those events or design of the events or</p> <p>21 -- meaning the events you're talking about. Yeah.</p> <p>22 And people -- I mean, it happens all the time. Did</p> <p>23 someone use my name to get the thing? Maybe.</p> <p>24 MR. GINSBERG: Don't speculate or</p> <p>25 guess.</p>
<p style="text-align: right;">Page 95</p> <p>1 N. SPANOS</p> <p>2 Q Have you ever witnessed her being a host?</p> <p>3 A Yes.</p> <p>4 Q And have you ever witnessed her as being a</p> <p>5 host of an event at Satoshi Square that Zap.org</p> <p>6 sponsored?</p> <p>7 A So if -- I'm not sure exactly what you</p> <p>8 perceive sponsoring is. I think we have two different</p> <p>9 ideas of what the word sponsor means. So --</p> <p>10 Q What's your idea of the word sponsor?</p> <p>11 A Sponsors like rent the place out or do, you</p> <p>12 know, all kinds of stuff like that. So yeah, you</p> <p>13 know, Zap.org never rented a place, you know, where</p> <p>14 did you say? What was the address?</p> <p>15 Q 45 Mott.</p> <p>16 A That's a bar.</p> <p>17 Q So, but Zap.org bought the drinks?</p> <p>18 A I could -- I could imagine that Zap.org sent</p> <p>19 to someone, someone requested for them to pay for the</p> <p>20 drinks. And those guys sent some kind of</p> <p>21 cryptocurrency which thereby someone else, not me,</p> <p>22 converted the cryptocurrency and bought drink tickets,</p> <p>23 I believe, because there were drink tickets being</p> <p>24 handed out. I assume that would be it. I really</p> <p>25 don't know.</p>	<p style="text-align: right;">Page 97</p> <p>1 N. SPANOS</p> <p>2 THE WITNESS: Yeah. Yeah.</p> <p>3 MR. GINSBERG: Just -- if there's a</p> <p>4 question, just respond to it.</p> <p>5 THE WITNESS: Okay. I'm sorry. I just</p> <p>6 want people to get -- you know, understand the</p> <p>7 industry.</p> <p>8 MR. GINSBERG: Okay. There's no</p> <p>9 question pending.</p> <p>10 THE WITNESS: You know what I mean?</p> <p>11 Like you're trying to fit it into this square world.</p> <p>12 It's a disorganized hodgepodge of, you know,</p> <p>13 cryptocurrency enthusiasts, anarchical capitalists,</p> <p>14 libertarians. I mean, it's just a bunch of cats</p> <p>15 herding cats.</p> <p>16 You know? It doesn't -- there's no</p> <p>17 rhyme or reason. I don't take anything personal. I</p> <p>18 just don't do anything. I try not to do -- I mean,</p> <p>19 that's what it is, you know, trying to like paint some</p> <p>20 kind of picture to people who don't understand the</p> <p>21 industry.</p> <p>22 BY MR. HELLER:</p> <p>23 Q But you had -- but you had nothing to do</p> <p>24 with the sponsoring by Zap.org of any of these events.</p> <p>25 Is that correct?</p>

25 (Pages 94 - 97)

<p style="text-align: right;">Page 98</p> <p>1 N. SPANOS</p> <p>2 A Yeah. I did not pay for them.</p> <p>3 Q You didn't personally?</p> <p>4 A No.</p> <p>5 Q Okay. So you have no idea how many events</p> <p>6 Zap.org sponsored and paid for the alcohol at these</p> <p>7 events?</p> <p>8 A No. I get -- anyway, whatever. I get</p> <p>9 emails, or not emails. What the hell is it called?</p> <p>10 MR. GINSBERG: There's no question.</p> <p>11 THE WITNESS: Tweets.</p> <p>12 BY MR. HELLER:</p> <p>13 Q Have you ever represented Zap.org in --</p> <p>14 yeah; at any tradeshow?</p> <p>15 A Yeah. I put the banner. I have a couple of</p> <p>16 slides at the end of a 30- or 40-slide presentation</p> <p>17 that I have. I have, you know, two or three slides</p> <p>18 for Zap.</p> <p>19 Q Have you ever stood in a Zap booth at a</p> <p>20 tradeshow?</p> <p>21 A I've sat at a Zap booth when I was tired.</p> <p>22 Q Have you ever stood in a Zap booth?</p> <p>23 A Probably stood before I sat.</p> <p>24 Q Okay. And have there been Zap booths around</p> <p>25 the country?</p>	<p style="text-align: right;">Page 100</p> <p>1 N. SPANOS</p> <p>2 A On behalf of?</p> <p>3 Q Yes.</p> <p>4 MR. GINSBERG: Yes. On behalf of was</p> <p>5 the question.</p> <p>6 THE WITNESS: That's a pretty good</p> <p>7 question you've got there. Like I said, I have 40 or</p> <p>8 20 or 30 slides and then I put in a couple Zap.org</p> <p>9 slides at the end of the presentation, of my</p> <p>10 presentations to explain the technology.</p> <p>11 BY MR. HELLER:</p> <p>12 Q Okay. And so, those presentations --</p> <p>13 A And I've done that in Belarus. I've done it</p> <p>14 -- I don't know if I did it in Belarus. I've done it</p> <p>15 all over the world.</p> <p>16 Q And you've done it in New York?</p> <p>17 A Yeah. I think so.</p> <p>18 MR. GINSBERG: Don't guess.</p> <p>19 THE WITNESS: I don't remember.</p> <p>20 MR. GINSBERG: Do you remember ever</p> <p>21 doing it in New York?</p> <p>22 THE WITNESS: Listen, it's a blur. But</p> <p>23 I believe I must have done it in New York.</p> <p>24 MR. GINSBERG: Don't --</p> <p>25 THE WITNESS: I've done it in Florida.</p>
<p style="text-align: right;">Page 99</p> <p>1 N. SPANOS</p> <p>2 A Around the world probably.</p> <p>3 Q Okay. Ever a Zap booth in New York?</p> <p>4 A I don't remember. But yeah, maybe. Yeah.</p> <p>5 Maybe. I don't remember. Maybe.</p> <p>6 Q When --</p> <p>7 A Do you have something that can refresh my</p> <p>8 memory? Because I don't remember.</p> <p>9 Q Well, I just --</p> <p>10 A I've been to dozens and dozens and dozens of</p> <p>11 tradeshow over the year. I don't remember what city</p> <p>12 I'm in, you know.</p> <p>13 Q Have you ever been to a tradeshow --</p> <p>14 A The hotels look the same to me.</p> <p>15 Q Have you ever been to a tradeshow in New</p> <p>16 York relating --</p> <p>17 A I have. But I don't --</p> <p>18 MR. GINSBERG: Let him finish the</p> <p>19 question, Nick.</p> <p>20 THE WITNESS: I'm sorry.</p> <p>21 BY MR. HELLER:</p> <p>22 Q Have you ever been to a tradeshow in New</p> <p>23 York which you were there on behalf of Zap.org?</p> <p>24 A On behalf of?</p> <p>25 Q Or the Synapse Foundation.</p>	<p style="text-align: right;">Page 101</p> <p>1 N. SPANOS</p> <p>2 Is that okay?</p> <p>3 MR. GINSBERG: Nick, do you recall --</p> <p>4 THE WITNESS: I don't -- listen --</p> <p>5 MR. GINSBERG: -- ever doing it in New</p> <p>6 York?</p> <p>7 THE WITNESS: I'm not a hundred percent</p> <p>8 positive. I'm 78 percent. You know, I'm not a</p> <p>9 hundred percent positive because I don't remember.</p> <p>10 Yeah. I've done it in New York, meaning the slides.</p> <p>11 BY MR. HELLER:</p> <p>12 Q Yes.</p> <p>13 A I've had two or three slides after a long</p> <p>14 slideshow for Zap. Yes.</p> <p>15 Q In New York?</p> <p>16 A Yes. I remember now. Thank you. In</p> <p>17 addition to --</p> <p>18 (Exhibit Spanos C was marked for</p> <p>19 identification.)</p> <p>20 BY MR. HELLER:</p> <p>21 Q I only have two of these. But I'll make a</p> <p>22 copy.</p> <p>23 A That doesn't look like me.</p> <p>24 MR. GINSBERG: But I want to finish</p> <p>25 your question in addition to what you were asking him.</p>

26 (Pages 98 - 101)

Page 102

1 N. SPANOS
 2 MR. HELLER: In addition to?
 3 THE WITNESS: You want me to finish the
 4 question?
 5 MR. GINSBERG: I want you to finish the
 6 answer. You said you had two slides after a long deck
 7 of slides in addition to something. And then you
 8 stopped. You were interrupted.
 9 THE WITNESS: I don't remember what I
 10 was saying.
 11 BY MR. HELLER:
 12 Q Okay. Mr. Spanos, I've placed before you
 13 what is a --
 14 MR. GINSBERG: Is this -- I'm sorry.
 15 Is this for me?
 16 MR. HELLER: Yeah. You can have that.
 17 BY MR. HELLER:
 18 Q There's a document that's been marked as
 19 defendant -- Spanos C.
 20 A I can't see it.
 21 Q And it appears to be a picture of you in
 22 front of a Zap.org booth. Do you recognize that?
 23 A Yeah. It looks like the inside of a hotel
 24 with a Zap.org booth which I've had in dozens of
 25 different countries around the world.

Page 103

1 N. SPANOS
 2 Q And have you -- do you recall ever being in
 3 front of a booth of Zap.org in New York City, in a
 4 hotel in New York City?
 5 A I could believe that I have been. But I
 6 don't remember this certain -- like I couldn't tell
 7 you what hotel this is or what event it is.
 8 MR. GINSBERG: Nick, do you recall in
 9 New York being in front of a Zap.org --
 10 THE WITNESS: Yeah. I said 78 percent.
 11 So now it's probably more. I just don't remember
 12 because there's so many events that I get invited to.
 13 BY MR. HELLER:
 14 Q Do you know how many tradeshows there are in
 15 New York City annually relating to bitcoin?
 16 A Probably a lot.
 17 Q And does Zap.org have a booth each time?
 18 A I don't think so. No. No way.
 19 Q Does Zap.org have a booth at various times
 20 during these tradeshows in New York City?
 21 A Zap.org, I mean, now with this picture, I
 22 don't know. Probably. It's been I'm not sure how
 23 many times. But there have probably been hundreds, at
 24 least a hundred tradeshows in New York probably.
 25 Q Yes.

Page 104

1 N. SPANOS
 2 A Or 80 something maybe. I don't know what
 3 the definition of a tradeshow is. But, and of those
 4 times, I'm not sure. I'm not sure how many times
 5 there was a booth. Like before you asked me about a
 6 slide show. There've been events that, you know, Zap
 7 was at. They had booths. I wasn't there.
 8 Q But you know Zap has had booths at
 9 tradeshows in New York. You don't know how many. But
 10 Zap has had booths.
 11 A I don't -- yeah. I just don't know the
 12 exact number or -- I mean, now I'm recollecting. I
 13 said before that 78 percent. But a hundred -- you
 14 know, 78 percent I thought. But now I'm recollecting
 15 a little more. I just don't know how many times.
 16 MR. GINSBERG: Seventy-eight percent of
 17 what?
 18 THE WITNESS: Seventy-eight percent of
 19 my brain is saying yes.
 20 MR. GINSBERG: Yes what?
 21 THE WITNESS: Yes. Zap has had booths
 22 in New York. I just don't remember a hundred percent
 23 where. For sure I don't remember when or what the
 24 name of the tradeshow was or who was there or even if
 25 I was there. For sure I don't remember that.

Page 105

1 N. SPANOS
 2 BY MR. HELLER:
 3 Q Do you know --
 4 A Or even if I have known that at the time
 5 that it happened. I might have learned after. But
 6 it's all a blur to me. There's booths all over the
 7 world. There's booths in all over the world.
 8 Q Do you know the purpose of the booth that
 9 Zap has at a particular tradeshow, why it was placing
 10 booths at tradeshows?
 11 A To explain the technology.
 12 Q Okay. And did Zap have individuals that it
 13 -- paid or unpaid, representing the company at these
 14 booths to explain the technology?
 15 MR. GINSBERG: If you know. Don't
 16 guess.
 17 THE WITNESS: Who have explained?
 18 Yeah.
 19 BY MR. HELLER:
 20 Q And at times, were you one of those
 21 individuals in the booth to explain the technology?
 22 A Listen, when I sit at a booth, all of a
 23 sudden there's a big crowd. I can't even breathe,
 24 that comes around me. So am I -- do I have to man the
 25 booth? No.

<p style="text-align: right;">Page 106</p> <p>1 N. SPANOS</p> <p>2 Q But there's usually somebody --</p> <p>3 A Is there a schedule? Am I on it? No.</p> <p>4 Q Is there --</p> <p>5 A I don't even know if there's a schedule.</p> <p>6 Q But to the best of your knowledge, there is</p> <p>7 someone with knowledge of the technology who would be</p> <p>8 at the booth to explain the technology.</p> <p>9 A I suppose. I hope so. I hope so. You?</p> <p>10 Q Are you familiar with an individual by the</p> <p>11 name of Tom St. Laurent?</p> <p>12 A Yeah.</p> <p>13 Q Please tell me how you're familiar with Tom</p> <p>14 St. Laurent.</p> <p>15 A Tom St. Laurent is a technology guy. And</p> <p>16 how I met him? What's the question?</p> <p>17 Q How are you familiar with him? How'd you</p> <p>18 become familiar with him? How'd you meet him?</p> <p>19 A Okay. Thanks. I'm not familiar with</p> <p>20 anybody.</p> <p>21 Q I don't want to know.</p> <p>22 A I'm just saying I don't know what you mean</p> <p>23 by -- that's not my -- that's not my addiction there.</p> <p>24 I met him -- I met him -- I think I met him on Wall</p> <p>25 Street one time.</p>	<p style="text-align: right;">Page 108</p> <p>1 N. SPANOS</p> <p>2 A I don't think so.</p> <p>3 Q Is he currently the technical director of</p> <p>4 Zap.org?</p> <p>5 A I don't think so.</p> <p>6 Q Was Tom St. Laurent ever the technical</p> <p>7 director of the Synapse Foundation?</p> <p>8 A If there was someone to be called, meaning</p> <p>9 like is aid before that these titles are really not</p> <p>10 that -- have any meaning whatsoever. But is he a</p> <p>11 smart guy and gave good suggestions and good</p> <p>12 recommendations? Yes.</p> <p>13 Q Was Tom St. Laurent ever compensated by the</p> <p>14 Synapse Foundation?</p> <p>15 A I'm not sure. I think so.</p> <p>16 Q Do you know where Tom St. Laurent resides?</p> <p>17 A No.</p> <p>18 Q Do you know what state he resides in?</p> <p>19 A I'm thinking New Jersey. I don't know.</p> <p>20 Q Do you know if Tom St. --</p> <p>21 A Or New York or New Jersey. I don't know.</p> <p>22 Connecticut. New York, New Jersey or Connecticut.</p> <p>23 Q Do you --</p> <p>24 A I'm not sure if he resides there. But I</p> <p>25 know that he -- you know --</p>
<p style="text-align: right;">Page 107</p> <p>1 N. SPANOS</p> <p>2 Q Okay. Was Tom --</p> <p>3 A The first time.</p> <p>4 Q Was Tom St. Laurent ever affiliated with the</p> <p>5 Bitcoin Center of New York City?</p> <p>6 A Yeah. No. No.</p> <p>7 Q Was Tom St. Laurent --</p> <p>8 A He came by the Bitcoin Center. But I'm not</p> <p>9 sure how many times. But I could probably count it on</p> <p>10 one hand. I don't remember.</p> <p>11 I only remember him like, you know, just</p> <p>12 like 200 people every Monday, 300, 500 people every</p> <p>13 Monday, 300 other people every Thursday, 40 or 50</p> <p>14 people there day to day, every day. Just like them.</p> <p>15 He came by.</p> <p>16 Q Okay. Did Tom --</p> <p>17 A He had no position at the Bitcoin Center.</p> <p>18 The reason why you're asking me this question is</p> <p>19 because the default of the programmers were to -- the</p> <p>20 default of the little box that said affiliation or</p> <p>21 previous job or I don't know what -- it doesn't say</p> <p>22 anything. It just says Bitcoin Center under a bunch</p> <p>23 of people. That was the default of that website.</p> <p>24 Q Is Tom St. Laurent, is he currently the</p> <p>25 technical director of the Synapse Foundation?</p>	<p style="text-align: right;">Page 109</p> <p>1 N. SPANOS</p> <p>2 Q Do you have any --</p> <p>3 A He has slept there in the past. Maybe it's</p> <p>4 a girlfriend. I don't know.</p> <p>5 Q Do you know if Tom St. Laurent is employed</p> <p>6 by an individual or an entity?</p> <p>7 A No.</p> <p>8 Q do you know whether he maintains an office</p> <p>9 to work out of?</p> <p>10 A No.</p> <p>11 Q Have you ever visited Tom St. Laurent at an</p> <p>12 office?</p> <p>13 A Have I seen him in an office?</p> <p>14 Q Yes.</p> <p>15 A Yeah.</p> <p>16 Q And where was that office located?</p> <p>17 A I've seen him in my real estate office.</p> <p>18 Q Your personal real estate office or your</p> <p>19 entity?</p> <p>20 A Not my personal real estate office. I used</p> <p>21 to have shares of a corporation with some other</p> <p>22 people. And there was a real estate office.</p> <p>23 Q And so, you met him in your office?</p> <p>24 A No. I met him on Wall Street.</p> <p>25 Q No. I'm asking --</p>

28 (Pages 106 - 109)

<p style="text-align: right;">Page 110</p> <p>1 N. SPANOS</p> <p>2 A I'm sorry.</p> <p>3 Q -- if you ever had a meeting with him in a</p> <p>4 business office. And you said it was a real estate --</p> <p>5 your real estate office.</p> <p>6 MR. GINSBERG: Objection. He didn't</p> <p>7 say he had a meeting with him.</p> <p>8 THE WITNESS: Yeah. You asked me --</p> <p>9 MR. GINSBERG: You asked him if he ever</p> <p>10 saw him in an office.</p> <p>11 BY MR. HELLER:</p> <p>12 Q Saw him. Okay. I apologize. Did you ever</p> <p>13 see Mr. St. Laurent in an office that was not an</p> <p>14 office that you worked out of?</p> <p>15 A In an office?</p> <p>16 Q Yeah.</p> <p>17 A You're asking me if, you know, I worked out</p> <p>18 of an office. I never said that. I said I owned part</p> <p>19 of a real estate company.</p> <p>20 Q Okay. Let's go back just to make this</p> <p>21 clear. Have you ever met with Tom St. Laurent in an</p> <p>22 office in New York City?</p> <p>23 A Yes.</p> <p>24 Q Okay. How many times?</p> <p>25 A I don't remember.</p>	<p style="text-align: right;">Page 112</p> <p>1 N. SPANOS</p> <p>2 A Not that I know of. I don't think so.</p> <p>3 Q Do you have any access to any electronic</p> <p>4 devices that would have Steve Geros' business address?</p> <p>5 A I don't know.</p> <p>6 Q Have you ever communicated with Steve Geros</p> <p>7 electronically?</p> <p>8 A Yeah.</p> <p>9 Q Do you maintain copies of electronic emails</p> <p>10 that are received from Steve Geros?</p> <p>11 A No.</p> <p>12 MR. GINSBERG: Objection. There's been</p> <p>13 no testimony there were electronic emails received</p> <p>14 from Steve Geros.</p> <p>15 MR. HELLER: Say that again?</p> <p>16 MR. GINSBERG: The testimony was not</p> <p>17 that he received electronic emails from Steve Geros.</p> <p>18 You asked him if he communicated electronically.</p> <p>19 THE WITNESS: Yeah.</p> <p>20 MR. GINSBERG: And as Mr. Spanos</p> <p>21 previously told you, that includes phones and phone</p> <p>22 apps.</p> <p>23 MR. HELLER: Gotcha.</p> <p>24 BY MR. HELLER:</p> <p>25 Q Have you ever communicated with Steve Geros</p>
<p style="text-align: right;">Page 111</p> <p>1 N. SPANOS</p> <p>2 Q More than once?</p> <p>3 A Yes.</p> <p>4 Q Do you recall where that office was?</p> <p>5 A Yes.</p> <p>6 Q Okay. Where was that office?</p> <p>7 A It was at a real estate company which I</p> <p>8 owned shares of which is not there anymore.</p> <p>9 Q Did you ever meet him in a different office</p> <p>10 in New York City?</p> <p>11 A I don't remember. I don't think so. No.</p> <p>12 Q Do you have any access to any electronic</p> <p>13 devices that would have Tom St. Laurent's address?</p> <p>14 A No.</p> <p>15 Q Do you have access to any electronic devices</p> <p>16 that would have Steve Geros' address?</p> <p>17 MR. GINSBERG: I'm sorry? What was the</p> <p>18 name?</p> <p>19 MR. HELLER: Steve Geros. G-E-R-O-S.</p> <p>20 THE WITNESS: No. Where he lives?</p> <p>21 Where these guys live?</p> <p>22 BY MR. HELLER:</p> <p>23 Q Yeah.</p> <p>24 A No.</p> <p>25 Q Do you have any access to --</p>	<p style="text-align: right;">Page 113</p> <p>1 N. SPANOS</p> <p>2 through email?</p> <p>3 A I don't know. Probably. I think.</p> <p>4 Q Have you performed a search of your email to</p> <p>5 see if you found any emails with Steve Geros?</p> <p>6 A I had someone perform the search because I</p> <p>7 don't really get into the email thing.</p> <p>8 Q Who performed the search?</p> <p>9 A I don't remember. Some girl.</p> <p>10 Q When was the search performed?</p> <p>11 A Hold on. Let me think. Let me think. I</p> <p>12 don't remember who looked at the computer and went</p> <p>13 through the stuff.</p> <p>14 Q Do you recall when?</p> <p>15 A I don't know. A few months ago and I gave</p> <p>16 them to the lawyer.</p> <p>17 Q What did you give to the lawyer?</p> <p>18 A A bunch of emails. They didn't give them to</p> <p>19 you?</p> <p>20 Q Emails with Steve Geros?</p> <p>21 A I'm not sure. You're asking me -- you're</p> <p>22 talking to someone who doesn't really read the email,</p> <p>23 right? And then you're asking me if I sent or if I</p> <p>24 had an email from someone. I have an email from a lot</p> <p>25 of people probably. They don't get answered. I have</p>

29 (Pages 110 - 113)

<p style="text-align: right;">Page 114</p> <p>1 N. SPANOS</p> <p>2 unanswered email in my world. My world is a bunch of</p> <p>3 unanswered email because I can't read.</p> <p>4 I mean, I know how to read. I used to read.</p> <p>5 But it just hurts me too much and it makes me dizzy.</p> <p>6 So I've had many eye surgeries. So I have a very high</p> <p>7 white blood cell count because I was down at the</p> <p>8 Ground Zero. And I got 20,000 parts per million</p> <p>9 lymphocytes. And I'm probably about to die out here</p> <p>10 with this coronavirus. I should not be out here.</p> <p>11 But I came out here to answer your</p> <p>12 questions. So I'm trying to. But you're asking me</p> <p>13 things that probably -- anyway. Keep going. I'm</p> <p>14 answering everything you've got. I'm answering</p> <p>15 everything you're asking me accurately I believe.</p> <p>16 Q So do you know whether you have unanswered</p> <p>17 emails from Ben Young?</p> <p>18 A I have no idea. Probably. I'm not sure</p> <p>19 because I tell everyone don't send me any emails</p> <p>20 because I don't answer them. Did you send me emails</p> <p>21 that I haven't answered?</p> <p>22 Q Do you have --</p> <p>23 A Mr. Ginsberg?</p> <p>24 MR. GINSBERG: I'm not being</p> <p>25 questioned.</p>	<p style="text-align: right;">Page 116</p> <p>1 N. SPANOS</p> <p>2 way with Zap.org?</p> <p>3 A It just sounds familiar. The name sounds</p> <p>4 familiar from, you know, like many -- a few years ago.</p> <p>5 I think I'm not sure.</p> <p>6 Q Okay.</p> <p>7 A Maybe that's some Wall Street guy. I don't</p> <p>8 know.</p> <p>9 Q I'm going to take a two-minute break. I'm</p> <p>10 going to talk to my client for a minute and then we're</p> <p>11 going to decide what additional questions to ask,</p> <p>12 okay?</p> <p>13 MR. GINSBERG: Sure.</p> <p>14 THE WITNESS: Can I go to the bathroom</p> <p>15 again?</p> <p>16 MR. HELLER: Yes, you can.</p> <p>17 THE WITNESS: All right. Thank you.</p> <p>18 MR. HELLER: We're going off the</p> <p>19 record.</p> <p>20 COURT REPORTER: We're going off the</p> <p>21 record. The time now is 1:08 p.m.</p> <p>22 (Off the record.)</p> <p>23 COURT REPORTER: We're back on the</p> <p>24 record. The time now is 1:14 p.m.</p> <p>25 THE WITNESS: Thank you. Thank you.</p>
<p style="text-align: right;">Page 115</p> <p>1 N. SPANOS</p> <p>2 THE WITNESS: Can you answer the</p> <p>3 question?</p> <p>4 MR. HELLER: I can't answer that</p> <p>5 question because it would be an attorney-client --</p> <p>6 THE WITNESS: Well, he's laughing</p> <p>7 because, yeah, I don't read email.</p> <p>8 BY MR. HELLER:</p> <p>9 Q Okay. Now we're going to talk about tom St.</p> <p>10 Laurent. Do you have unanswered emails from Tom St.</p> <p>11 Laurent?</p> <p>12 A I'm not sure.</p> <p>13 Q Same question regarding Eric Dixon.</p> <p>14 A I'm not sure. I know that there's 200,000,</p> <p>15 300,000 unanswered emails, unread emails in my</p> <p>16 mailbox.</p> <p>17 Q Who is -- are you familiar with an</p> <p>18 individual by the name of Evan Renov, R-E-N-O-V?</p> <p>19 A No. Maybe. What's the name again?</p> <p>20 Q Evan Renov. R-E-N-O-V.</p> <p>21 A Sounds familiar.</p> <p>22 Q Do you know whether he's affiliated in any</p> <p>23 way with the Synapse Foundation?</p> <p>24 A I'm not sure.</p> <p>25 Q Do you know whether he's affiliated in any</p>	<p style="text-align: right;">Page 117</p> <p>1 N. SPANOS</p> <p>2 MR. HELLER: No problem.</p> <p>3 BY MR. HELLER:</p> <p>4 Q Mr. Spanos, who built the technology for</p> <p>5 Zap.org?</p> <p>6 A A bunch of people.</p> <p>7 Q Okay. Could you name them?</p> <p>8 A A lot I think were bounties. So a lot of</p> <p>9 misconceptions about this industry, which is a new</p> <p>10 industry and a lot of people don't understand is that</p> <p>11 most of the work is done with bounties to the</p> <p>12 programmers that are known by their handle or maybe</p> <p>13 not known because it doesn't matter because it's an</p> <p>14 open source project.</p> <p>15 And if they enter into the GitHub and that</p> <p>16 branch is accepted, they would get some kind of bounty</p> <p>17 in cryptocurrency from the foundation. So it's a very</p> <p>18 big communication gap because this industry's not like</p> <p>19 any industry that anyone's seen before. And that's</p> <p>20 why the questions are a little -- many of the</p> <p>21 questions are a little -- they could have been better</p> <p>22 questions if you understood the industry.</p> <p>23 I'm not saying that you're not smart.</p> <p>24 You're a very smart, brilliant guy. This is a certain</p> <p>25 type of industry that it's more on the -- fancies</p>

30 (Pages 114 - 117)

<p style="text-align: right;">Page 118</p> <p>1 N. SPANOS</p> <p>2 itself to be of the decentralized nation -- nature,</p> <p>3 which -- so bounties such as the developer of -- the</p> <p>4 creator of Bitcoin. No one knows who he is. He did</p> <p>5 an incredible job. He has a pseudonym named Satoshi</p> <p>6 Nakamoto. But no one knows who he is.</p> <p>7 So many -- a lot of code is written through</p> <p>8 bounties and others. And if you go on the GitHub, you</p> <p>9 know, you'll see there's hundreds of people. I don't</p> <p>10 know how many people, from all walks of -- you don't</p> <p>11 even know who they are because they'll never tell you</p> <p>12 probably.</p> <p>13 Q So did Blockchain Technologies Corporation</p> <p>14 help build --</p> <p>15 A Some part. Yeah.</p> <p>16 Q -- Zap.org?</p> <p>17 MR. GINSBERG: Let him finish his</p> <p>18 question.</p> <p>19 THE WITNESS: I'm sorry. I'm sorry</p> <p>20 BY MR. HELLER:</p> <p>21 Q Zap.org. And the answer is some part.</p> <p>22 A Yeah. Some part probably.</p> <p>23 Q Okay. Did Blockchain Technologies</p> <p>24 Corporation start the process of building the</p> <p>25 technology or that was started somewhere else?</p>	<p style="text-align: right;">Page 120</p> <p>1 N. SPANOS</p> <p>2 A No, no. I don't -- I didn't say that you</p> <p>3 made it up. I just said I'm not really familiar a</p> <p>4 hundred percent. I could see where this was created.</p> <p>5 But I'm not familiar with this document myself</p> <p>6 personally. That's what I'm saying.</p> <p>7 Q Do you know whether other than these three</p> <p>8 invoices that are next to defendant's Exhibit B in the</p> <p>9 aggregate amount of \$20,000, whether there was any</p> <p>10 additional money paid by the Synapse Foundation to</p> <p>11 Blockchain Technologies --</p> <p>12 A Probably.</p> <p>13 Q -- for services provided on its behalf? Why</p> <p>14 do you say probably? Do you --</p> <p>15 A I'm not an accountant. I'm not the</p> <p>16 accountant. I'm not anything. I don't know about</p> <p>17 this. I can't -- I told you I can't see. I won't</p> <p>18 trust myself to see. Maybe it's the wrong thing.</p> <p>19 Maybe I should get a projection screen TV and sit in</p> <p>20 front of it all day --</p> <p>21 Q From what --</p> <p>22 A -- and try to read.</p> <p>23 Q From what period of time to what period of</p> <p>24 time did Blockchain Technologies Corporation provide</p> <p>25 services for the Synapse Foundation?</p>
<p style="text-align: right;">Page 119</p> <p>1 N. SPANOS</p> <p>2 A Oh, I don't know. Blockchain Technologies</p> <p>3 Corporation was paid by the Synapse Foundation to help</p> <p>4 out in some places after I begged and pleaded for them</p> <p>5 to hire Blockchain Technologies for a few things.</p> <p>6 Q And how was Blockchain Technologies paid?</p> <p>7 In bitcoin?</p> <p>8 A You got it right there.</p> <p>9 Q Was it paid in U.S. dollars or in --</p> <p>10 A I don't know. You showed it to me. I</p> <p>11 haven't really never seen it. I mean, I think I</p> <p>12 understand what it is. But I've never see this thing.</p> <p>13 Q Just to let you know --</p> <p>14 A I mean, for all I know, you made this up. I</p> <p>15 don't think so. I think it's actually an invoice from</p> <p>16 Blockchain Technologies to the Synapse Foundation</p> <p>17 where the Synapse Foundation paid for Blockchain</p> <p>18 Technologies to do some work.</p> <p>19 MR. GINSBERG: And Mr. Spanos is</p> <p>20 pointing to Spanos Exhibit B.</p> <p>21 BY MR. HELLER:</p> <p>22 Q He is, and just to let you know that these</p> <p>23 documents were produced by your counsel, so.</p> <p>24 A Okay.</p> <p>25 Q We didn't make anything up.</p>	<p style="text-align: right;">Page 121</p> <p>1 N. SPANOS</p> <p>2 A I don't know. I don't know exactly. I</p> <p>3 mean, I don't remember.</p> <p>4 Q Who --</p> <p>5 A Not I don't know. I don't remember.</p> <p>6 Q Who from Blockchain Technologies Corporation</p> <p>7 worked on the Synapse Foundation project for which</p> <p>8 Blockchain Technologies was paid?</p> <p>9 A Say that again.</p> <p>10 Q Who from Blockchain Technologies Corporation</p> <p>11 --</p> <p>12 A Yeah.</p> <p>13 Q -- worked on the Synapse Foundation project</p> <p>14 for which Blockchain -- for which Blockchain</p> <p>15 Technologies was paid?</p> <p>16 A Who from -- who from Blockchain Technologies</p> <p>17 Corp. worked on things that Synapse paid for? I don't</p> <p>18 know. I mean, not I don't know. I don't remember.</p> <p>19 But --</p> <p>20 Q Do you have any records that would refresh</p> <p>21 your recollection as to who worked on it?</p> <p>22 A I'd have to go over Blockchain stuff, get</p> <p>23 someone to look at the Blockchain stuff, Blockchain</p> <p>24 Technologies stuff to look at that. I mean, I don't</p> <p>25 remember. For sure it was people. I don't know.</p>

Page 122

1 N. SPANOS

2 Q Did you receive any --

3 A Or subcontractors. There's subcontractors,

4 right? Like 1099s which have -- I mean, you have

5 1099s or whatever over there. Checks. There were

6 checks that were sent to you, right? Yeah. No?

7 Q Not in connection --

8 A Huh?

9 Q In connection with other things, yes.

10 A Blockchain Technologies checks. There are

11 no Blockchain technologies checks? So show me them

12 and I'll tell you who did what.

13 Q In connection with the Synapse Foundation?

14 A If it's around the time of this bill, maybe

15 I'll remember it to recollect, to help me with my

16 memory. I mean, you're asking me things. I do a lot

17 of things all day, different things. So it's, you

18 know -- I'm not a -- I'm not sitting there standing

19 over one project.

20 I've got hundreds of projects. Mr.

21 Herskowitz over here probably wants a piece of all of

22 them after he gave me \$105,000 instead of \$250,000.

23 And he probably wants my dead father's gas station

24 too. I run that also. Maybe he wants that.

25 Q Now that you made your point, are you ready

Page 123

1 N. SPANOS

2 to answer some questions?

3 A I don't even know what the question is.

4 Q Well, I will ask you.

5 A This same question? I don't know right now.

6 I would know if I had more documents to help me

7 recollect. I just don't -- it's not sparking right

8 now. I'm sorry. These are nuanced things.

9 I don't remember if it was a bounty. I

10 don't remember. I don't remember three years ago.

11 You're talking about three or four years. I don't

12 know. How many years ago was it?

13 Q In connection with the Synapse Foundation,

14 the ICO.

15 A I don't know. It's not an ICO. You know,

16 you keep saying ICO. It's not an ICO.

17 Q What was it?

18 A There was a token generation that occurred

19 which is a utility token which is software. So we

20 created software. You keep saying the word ICO. I

21 don't know that. And I'm trying to answer you because

22 I know you don't know that about the industry and

23 you're handicapped in that way. But --

24 Q When you say we, who are you referring to?

25 A The everybody, the everybody. You know,

Page 124

1 N. SPANOS

2 hundreds of people in the blogosphere -- not

3 blogosphere. On the Internet who had some opinion of

4 what might should have happened. Designs and talks

5 and arguments, you know. It's like a PTA meeting

6 online.

7 Q And who --

8 A Without titles. You know a PTA meeting?

9 The PTA meeting --

10 MR. GINSBERG: Nick, just answer the

11 questions.

12 THE WITNESS: I'm sorry. I'm trying to

13 explain it. He's asking me to like give him some kind

14 of corporate structure. It doesn't work that way.

15 BY MR. HELLER:

16 Q Did you receive any compensation in

17 connection with this utility token generation

18 software?

19 A No. Wait a second. Wait a second. No.

20 Q Did any company that you're affiliated with

21 receive any compensation?

22 A Yes.

23 Q What company received compensation?

24 A Well, Blockchain Technologies.

25 Q Any other entity with which you're

Page 125

1 N. SPANOS

2 affiliated with?

3 A I don't think so. I don't remember.

4 Q Do you have any evidence of any payments

5 that were made to Blockchain Technologies --

6 A Yeah. Right here. Right in front of me.

7 MR. GINSBERG: Let him finish the

8 question.

9 THE WITNESS: I'm sorry.

10 BY MR. HELLER:

11 Q -- in connection with the utility software.

12 And that's -- you pointed to Exhibit B.

13 A Yes.

14 Q Did you personally or any entity that you're

15 affiliated with receive any tokens in connection with

16 the utility software?

17 A Yes.

18 Q How many tokens did you --

19 A I don't know. Do I have to answer that?

20 MR. GINSBERG: Let him finish the

21 question.

22 THE WITNESS: Keep going.

23 BY MR. HELLER:

24 Q How many tokens did you or an entity that

25 you're affiliated --

<p style="text-align: right;">Page 126</p> <p>1 N. SPANOS</p> <p>2 A Five million.</p> <p>3 MR. GINSBERG: Nick, please give me</p> <p>4 time.</p> <p>5 THE WITNESS: Look, the guy wants an</p> <p>6 answer. I'm trying to help him out. I'm sorry.</p> <p>7 BY MR. HELLER:</p> <p>8 Q And who received it? You personally or an</p> <p>9 entity?</p> <p>10 A I don't remember. It's not me personally.</p> <p>11 Q If it --</p> <p>12 A And it -- huh?</p> <p>13 Q If it was an entity, was it Blockchain</p> <p>14 Technologies that received the 5 million tokens?</p> <p>15 A Most likely I think if I remember. I don't</p> <p>16 know. I don't remember.</p> <p>17 Q I'd ask that a record be left in the record.</p> <p>18 MR. GINSBERG: Excuse me?</p> <p>19 MR. HELLER: A record be left in the</p> <p>20 record as to which entity received the 5 million</p> <p>21 tokens.</p> <p>22 MR. GINSBERG: We've produced all of</p> <p>23 the documents. Mr. Spanos doesn't have the -- doesn't</p> <p>24 know the answer. I'm not sure what you're asking.</p> <p>25 MR. HELLER: There's an entity that</p>	<p style="text-align: right;">Page 128</p> <p>1 N. SPANOS</p> <p>2 You're asking a hypothetical. Mr. Spanos has just</p> <p>3 testified that he didn't receive it and he doesn't</p> <p>4 know which if any company did receive it.</p> <p>5 MR. HELLER: He said someone did</p> <p>6 receive it. I want to know who.</p> <p>7 MR. GINSBERG: Do you know who received</p> <p>8 it?</p> <p>9 THE WITNESS: I don't remember. But I</p> <p>10 think it was --</p> <p>11 MR. GINSBERG: I don't want you to</p> <p>12 speculate.</p> <p>13 THE WITNESS: Okay.</p> <p>14 MR. GINSBERG: You either know or you</p> <p>15 don't remember.</p> <p>16 THE WITNESS: I don't remember.</p> <p>17 BY MR. HELLER:</p> <p>18 Q Was it Blockchain Technologies Corporation?</p> <p>19 A Excuse me?</p> <p>20 Q Was it Blockchain Technologies Corporation</p> <p>21 that received the 5 million tokens?</p> <p>22 A I don't remember. But I believe so. But I</p> <p>23 don't remember.</p> <p>24 Q Like I said, you can check your records to</p> <p>25 determine whether or not Blockchain Technologies</p>
<p style="text-align: right;">Page 127</p> <p>1 N. SPANOS</p> <p>2 received 5 million tokens.</p> <p>3 THE WITNESS: Yeah. I believe --</p> <p>4 MR. GINSBERG: Stop it.</p> <p>5 THE WITNESS: Oh, I'm sorry.</p> <p>6 MR. HELLER: In connection with the</p> <p>7 utility software that was created --</p> <p>8 MR. GINSBERG: Right.</p> <p>9 MR. HELLER: -- for Synapse Foundation.</p> <p>10 And Mr. Spanos testified that he didn't get it</p> <p>11 personally and Blockchain Technologies Corp. did not</p> <p>12 get the 5 million tokens.</p> <p>13 THE WITNESS: I didn't say that.</p> <p>14 MR. GINSBERG: No. He didn't say that.</p> <p>15 He said he doesn't know.</p> <p>16 THE WITNESS: I said I don't remember.</p> <p>17 BY MR. HELLER:</p> <p>18 Q Okay. Assuming you didn't get it personally</p> <p>19 and Blockchain Technologies did not receive the 5</p> <p>20 million tokens --</p> <p>21 MR. GINSBERG: Stop.</p> <p>22 BY MR. HELLER:</p> <p>23 Q -- what other entity would have received the</p> <p>24 5 million tokens?</p> <p>25 MR. GINSBERG: Objection as to form.</p>	<p style="text-align: right;">Page 129</p> <p>1 N. SPANOS</p> <p>2 received the 5 million token.</p> <p>3 MR. GINSBERG: I mean, we've already</p> <p>4 checked the records. You've been -- you have been --</p> <p>5 MR. HELLER: And nothing has been</p> <p>6 produced.</p> <p>7 MR. GINSBERG: Excuse me. Whatever</p> <p>8 exists has been produced. We'll make another effort</p> <p>9 if we have not done that. But I believe we have</p> <p>10 produced everything that exists. I'm not sure how</p> <p>11 that relates to jurisdiction over the Zap.org in any</p> <p>12 event.</p> <p>13 MR. HELLER: It does. Payment for</p> <p>14 services rendered. But that's --</p> <p>15 MR. GINSBERG: Excuse me? I can't</p> <p>16 understand you.</p> <p>17 MR. HELLER: Payment for services</p> <p>18 rendered in New York if it was paid to Blockchain</p> <p>19 Technologies Corporation. I think it may have a --</p> <p>20 MR. GINSBERG: That's not how you get</p> <p>21 jurisdiction over --</p> <p>22 MR. HELLER: There are many aspects.</p> <p>23 MR. GINSBERG: Excuse me. That's not</p> <p>24 the law. That's not how you get jurisdiction. The</p> <p>25 law is very specific as to the bases for jurisdiction</p>

33 (Pages 126 - 129)

<p style="text-align: right;">Page 130</p> <p>1 N. SPANOS</p> <p>2 over an organization or an entity. And that's not one</p> <p>3 of them.</p> <p>4 BY MR. HELLER:</p> <p>5 Q Mr. Spanos, did you have any meetings with</p> <p>6 any attorneys in the city of New York in connection</p> <p>7 with the formation of the Synapse Foundation?</p> <p>8 A No.</p> <p>9 Q Did you have any meetings with any attorneys</p> <p>10 in New York in connection with the creation of</p> <p>11 Zap.org?</p> <p>12 A That would be acting as attorneys?</p> <p>13 Q Did you have any meetings with any attorneys</p> <p>14 in New York in connection with the formation of</p> <p>15 Zap.org?</p> <p>16 A No.</p> <p>17 Q Did you have any meetings with any</p> <p>18 individuals in New York in connection with the</p> <p>19 formation of Zap.org?</p> <p>20 A No.</p> <p>21 Q Did you have --</p> <p>22 A Wait, wait, wait. What'd you say?</p> <p>23 Q In connection with the formation of Zap.org.</p> <p>24 A Any individuals?</p> <p>25 Q Any individuals in New York.</p>	<p style="text-align: right;">Page 132</p> <p>1 N. SPANOS</p> <p>2 Q Did you have any meetings with Mr.</p> <p>3 Herskowitz in New York?</p> <p>4 A Yes.</p> <p>5 MR. GINSBERG: Let him finish the</p> <p>6 question.</p> <p>7 THE WITNESS: Oh, I'm sorry.</p> <p>8 BY MR. HELLER:</p> <p>9 Q -- in connection with an entity to be</p> <p>10 formed in the Isle of Man?</p> <p>11 A Yes.</p> <p>12 Q When did you have those meetings, that</p> <p>13 meeting?</p> <p>14 A Oh, I --</p> <p>15 MR. GINSBERG: Wait, wait, wait, wait,</p> <p>16 wait. This is far afield from Zap.org. Unless -- I</p> <p>17 mean, this has nothing to do with whether there was a</p> <p>18 jurisdiction over Zap.org.</p> <p>19 THE WITNESS: Yeah. No. I can't --</p> <p>20 can I write something?</p> <p>21 MR. GINSBERG: No.</p> <p>22 BY MR. HELLER:</p> <p>23 Q What was discussed in that meeting with Mr.</p> <p>24 Herskowitz?</p> <p>25 MR. GINSBERG: Objection, unless there</p>
<p style="text-align: right;">Page 131</p> <p>1 N. SPANOS</p> <p>2 A Yeah. Zap.org is a website.</p> <p>3 Q Okay.</p> <p>4 A I corrected him.</p> <p>5 MR. GINSBERG: Just answer --</p> <p>6 THE WITNESS: Keep my mouth shut?</p> <p>7 MR. GINSBERG: Just answer the</p> <p>8 question.</p> <p>9 THE WITNESS: I'm trying. But the guy</p> <p>10 is like --</p> <p>11 MR. GINSBERG: Did you have any</p> <p>12 meetings in New York with anyone regarding the</p> <p>13 creation of Zap.org, yes or no?</p> <p>14 BY MR. HELLER:</p> <p>15 Q You don't create a website?</p> <p>16 A I'm just saying. Probably.</p> <p>17 MR. GINSBERG: No. Answer the question</p> <p>18 about whether you had meetings in New York about the</p> <p>19 formation of Zap.org.</p> <p>20 THE WITNESS: No.</p> <p>21 BY MR. HELLER:</p> <p>22 Q Did you have any meetings with any</p> <p>23 individuals in New York regarding the formation of the</p> <p>24 Synapse Foundation?</p> <p>25 A No. I don't think so.</p>	<p style="text-align: right;">Page 133</p> <p>1 N. SPANOS</p> <p>2 was something relating to the presence of Zap.org in</p> <p>3 New York.</p> <p>4 THE WITNESS: Well, Mr. Herskowitz --</p> <p>5 the meeting was Mr. Herskowitz was supposed to give me</p> <p>6 \$250,000 and he didn't. He only gave \$105,000 many</p> <p>7 years before. And he realized I think -- I don't know</p> <p>8 if he realized. But I think he realized that he</p> <p>9 screwed up by not giving me all of the \$250,000 those</p> <p>10 many years before.</p> <p>11 So he befriended me and was walking</p> <p>12 around with me, telling me he was going to help me.</p> <p>13 But what he was doing was trying to take an inventory</p> <p>14 of what I did in my life so he could try to attach</p> <p>15 himself to it and try to sue me for it. And then he</p> <p>16 found the errors of his way.</p> <p>17 So he wanted to get 200 -- he wanted to</p> <p>18 supplement the \$250,000. He wanted to pay the rest of</p> <p>19 it that he didn't pay years before. And I said it</p> <p>20 doesn't work that way.</p> <p>21 And there was a meeting about the</p> <p>22 formation of a company. But it had nothing to do with</p> <p>23 Zap.org or the Synapse Foundation. It was something</p> <p>24 else at that time.</p> <p>25 BY MR. HELLER:</p>

34 (Pages 130 - 133)

Page 134

1 N. SPANOS

2 Q Okay.

3 A To the best of my recollection. And because

4 of that meeting, because he didn't give me the money,

5 I didn't -- I'd been under the gun. Because he didn't

6 give me the rest of that money and put a UCC on my

7 stuff, on all these people's things and he told me I

8 can't give the shares out to anyone. And I had all

9 these people. I lost a lot of people. People went on

10 to do great things. But I couldn't bring them onboard

11 with mine because he inhibited my ability to do

12 business and a really -- you know, I should be on top

13 of the world. But instead I'm under Mr. Herskowitz's

14 thumb. That's where I'm at.

15 BY MR. HELLER:

16 Q Anything else to add?

17 A Oh, I got a lot of things. I have --

18 MR. GINSBERG: No, no, no.

19 THE WITNESS: -- hundreds of ways --

20 hundreds of places where I could have did something

21 and made something of myself with these things. But

22 this gentleman over here has really destroyed me.

23 BY MR. HELLER:

24 Q Okay.

25 A I'm a simple person. I don't know about all

Page 135

1 N. SPANOS

2 this stuff. This is the first deposition I've ever

3 been in in my life. And I don't know what all this

4 stuff is. But I'm a victim. That was not Zap.org

5 back then and it wasn't Synapse Foundation back then.

6 It was another thing we were --

7 MR. GINSBERG: There's no question

8 pending.

9 THE WITNESS: Just saying. It was some

10 other organization name or something.

11 MR. GINSBERG: There's nothing pending.

12 THE WITNESS: And people stole the

13 names. It's crazy.

14 BY MR. HELLER:

15 Q I'm just going to see if I have a few more

16 questions and then we'll be done. I'm not sure if I

17 asked you --

18 A I'm going to tutor some people later. And

19 I'm wondering if --

20 MR. GINSBERG: Nick --

21 THE WITNESS: -- I have to give a

22 percentage to Mr. Herskowitz.

23 MR. GINSBERG: Nick, stop.

24 MR. HELLER: Anything else?

25 MR. GINSBERG: Stop.

Page 136

1 N. SPANOS

2 THE WITNESS: Just saying. All right.

3 I'm sorry. After you.

4 BY MR. HELLER:

5 Q Are you familiar with an individual by the

6 name of Nick Allen?

7 MR. GINSBERG: I'm sorry. I can't

8 understand you.

9 BY MR. HELLER:

10 Q Individual by the name of Nick Allen.

11 A I'm not sure if that's his name. But maybe.

12 Q Who are you thinking of when you --

13 A I don't know.

14 Q Is there a Nick Allen who you know is

15 associated with the Synapse Foundation?

16 A There's someone who said his name was Nick

17 Allen. I'm not sure if that's his name.

18 Q Okay. Well, the individual that refers to

19 himself as Nick Allen, is that individual associated

20 with the Synapse Foundation?

21 A The individual who has had referred to

22 himself as Nick Allen.

23 Q So is he referring to himself -- is the

24 individual who refers to himself as Nick Allen who

25 says he's affiliated with the Synapse Foundation, is

Page 137

1 N. SPANOS

2 he authorized to associate himself with the Synapse

3 Foundation?

4 A No. I don't think so.

5 MR. HELLER: Unless you have anything

6 else, I don't have anything else.

7 MR. HERSKOWITZ: I'd like to talk a few

8 minutes.

9 MR. HELLER: You want to give them 10

10 minutes?

11 COURT REPORTER: Going off the record?

12 MR. HELLER: Yes. Off the record.

13 COURT REPORTER: Going off the record.

14 The time now is 1:37 p.m.

15 (Off the record.)

16 COURT REPORTER: We're back on the

17 record. The time now is 1:43 p.m.

18 BY MR. HELLER:

19 Q Do you know of anyone who is promoting the

20 technology of Zap.org?

21 A Yeah. A lot of people.

22 Q Are you one of those individuals promoting

23 the technology of Zap.org?

24 A Explaining the technology if someone asked

25 me. I mean, if you asked me right now, I'll explain

Page 138

1 N. SPANOS

2 it to you.

3 Q Other than you, you say a lot of people.

4 Who's promoting the technology?

5 A Yeah. There's -- well, I don't know.

6 People who maybe have bought the software and want to

7 resell it for more money or want to explain it to

8 people. So there's media articles. There's stuff

9 going that hasn't -- there's no control over it,

10 centralized control.

11 Q So are there any specific individuals

12 authorized by the Synapse Foundation to promote the

13 software of Zap.org, to promote the technology?

14 A I'm not sure. At this moment?

15 Q At this moment.

16 A Yeah. I'm not sure.

17 Q Has there anyone, to your knowledge, been

18 engaged as far as being compensated to promote the

19 technology of Zap.org?

20 A In what timeline again?

21 Q From the time that the Synapse Foundation

22 was created to date.

23 A Okay. Yeah.

24 Q Who has been paid to promote the technology

25 of Zap.org?

Page 139

1 N. SPANOS

2 A Well, I'm not sure of every -- I'm not sure.

3 Q Well, who do you know?

4 A All right. So there's a guy doctor

5 something. Here's doctor. Charbovich or something.

6 Adrian. He's a last -- he's an Armenian.

7 Q Okay.

8 A I'm sorry. I always do that.

9 Theoretically, you know, depending on the bounty, if

10 there were bounties for stuff, whoever fulfilled the

11 requirements of the bounty.

12 Q Have you personally been paid to promote the

13 technology of Zap.org?

14 A Well, like I said, I got that 5 million Zap

15 sent to either this company which I believe -- I

16 believe -- I don't -- I'm not sure which -- but not me

17 personally. I think it went here.

18 Q But --

19 A I've got to check the wallet.

20 Q But the 5 million tokens was for promoting

21 the technology of Zap.org?

22 A Whatever. Whatever. Whatever I can give to

23 the project, meaning whatever I can do for the project

24 that I'm allowed to do.

25 Q Was Ben Young or an entity owned by Ben

Page 140

1 N. SPANOS

2 Young given tokens as well?

3 A I think so. Yeah.

4 Q Do you recall --

5 A I don't know how many.

6 Q Do you know what the reason was for Ben

7 Young getting tokens?

8 A Well, I don't know. Sometimes they give

9 tokens to get everyone on board, to get people on

10 board. So I'm not sure. This guy's been going all

11 day.

12 MR. GINSBERG: I don't want you to

13 guess. What?

14 THE WITNESS: So you've been having to

15 like write on that pad all day and I can't?

16 MR. GINSBERG: Mm-hmm.

17 THE WITNESS: That's ridiculous.

18 BY MR. HELLER:

19 Q Well, if you write on the pad, then I can

20 look at. So I don't think you want that.

21 A Oh, I don't care. What am I going to write?

22 The only thing I wrote --

23 Q Do you know if Eric Dixon received tokens?

24 A Probably.

25 Q You know how much?

Page 141

1 N. SPANOS

2 A I don't know. I'm not sure if he received

3 tokens or not. I don't know. I mean, I don't know if

4 I know. Yeah. I don't know. Was I privy to the

5 amounts? Maybe at one time.

6 Q Who would have records of the amount of

7 tokens that are given out to various individuals?

8 A It's on the wallets. It's on the computer.

9 You can look at it. It's all open source.

10 Q Okay. Is there anyone currently receiving

11 tokens for the promotion of Zap.org, the technology?

12 A I don't know. Probably. Maybe. There's

13 some bounties I think that are still floating around.

14 Q I have no further -- anyone hired to do

15 tradeshows to promote the technology of Zap.org to

16 your knowledge?

17 A No.

18 Q Do you know if anyone, to your knowledge,

19 has been hired to do events for Zap.org, to promote

20 the technology of Zap.org?

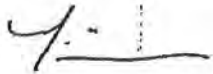
21 A Events?

22 Q Yeah.

23 A I don't think so.

24 Q Any PR companies hired? Who makes the

25 decision to hire individuals to promote the technology

<p style="text-align: right;">Page 142</p> <p>1 N. SPANOS</p> <p>2 of Zap.org?</p> <p>3 A Listen, it's like who makes the decisions --</p> <p>4 say that again.</p> <p>5 Q Who --</p> <p>6 A Yeah.</p> <p>7 Q -- on behalf of the Synapse --</p> <p>8 A Okay.</p> <p>9 Q The Synapse organization.</p> <p>10 A Yeah.</p> <p>11 Q The Synapse Foundation makes the decision as</p> <p>12 to who on behalf of the Synapse Foundation promotes</p> <p>13 the technology of Zap.org for pay?</p> <p>14 A Well, it's all bountied out. So I don't</p> <p>15 know, floating around. I don't think there's --</p> <p>16 there's -- I don't -- I don't know. I don't think so.</p> <p>17 I don't think anyone's getting paid.</p> <p>18 Q Okay.</p> <p>19 A I'm not sure. But I don't think so. It's</p> <p>20 all the community now.</p> <p>21 Q Okay. I have no --</p> <p>22 A I believe. If someone's got a hundred</p> <p>23 dollars' worth or something, you know, that's what</p> <p>24 we're talking about here.</p> <p>25 Q Mm-hmm.</p>	<p style="text-align: right;">Page 144</p> <p>1 N. SPANOS</p> <p>2 MR. GINSBERG: I'll get back to you.</p> <p>3 COURT REPORTER: Okay. You're getting</p> <p>4 something or you're getting it from him?</p> <p>5 MR. GINSBERG: I'll --</p> <p>6 MR. HELLER: Whatever we --</p> <p>7 MR. GINSBERG: I'll let you know.</p> <p>8 MR. HELLER: We'll figure it out.</p> <p>9 COURT REPORTER: Okay. We're going off</p> <p>10 the record. The time now is 1:51 p.m.</p> <p>11 (Signature Reserved.)</p> <p>12 (Whereupon, at 1:51 p.m., the</p> <p>13 proceeding was concluded.)</p> <p>14</p> <p>15</p> <p>16 NIKOLAOS SPANOS</p> <p>17</p> <p>18 Subscribed and sworn to before me this</p> <p>19 day of _____, 2020.</p> <p>20</p> <p>21</p> <p>22</p> <p>23 NOTARY PUBLIC</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 143</p> <p>1 N. SPANOS</p> <p>2 A Because they wrote an article, they got \$50</p> <p>3 worth of Zap tokens because it was bountied maybe if</p> <p>4 the bounty's still laying there. I'm not sure. I'm</p> <p>5 not sure. Personally I'm not sure.</p> <p>6 Q Okay.</p> <p>7 A Could I find out? I could probably find</p> <p>8 out. But I don't know off the top of my head.</p> <p>9 Q I only want to know what you know.</p> <p>10 A That's what I know, not much.</p> <p>11 Q No problem.</p> <p>12 MR. GINSBERG: We'd like to sign and</p> <p>13 read it.</p> <p>14 MR. HELLER: Excuse me?</p> <p>15 MR. GINSBERG: We'd like to read and</p> <p>16 sign it, the transcript.</p> <p>17 MR. HELLER: Yeah. Read and sign.</p> <p>18 Well, if he's going to read it.</p> <p>19 MR. GINSBERG: I'll read it to him.</p> <p>20 THE WITNESS: I have a reader.</p> <p>21 COURT REPORTER: Just the transcript</p> <p>22 order, you have original plus two on the portal. Is</p> <p>23 that what you'd like?</p> <p>24 MR. HELLER: Yeah.</p> <p>25 COURT REPORTER: And --</p>	<p style="text-align: right;">Page 145</p> <p>1 CERTIFICATE OF NOTARY PUBLIC</p> <p>2 I, KENNETH KATZ, the officer before whom the</p> <p>3 foregoing proceedings were taken, do hereby certify that</p> <p>4 any witness(es) in the foregoing proceedings, prior to</p> <p>5 testifying, were duly sworn; that the proceedings were</p> <p>6 recorded by me and thereafter reduced to typewriting by a</p> <p>7 qualified transcriptionist; that said digital audio</p> <p>8 recording of said proceedings are a true and accurate</p> <p>9 record to the best of my knowledge, skills, and ability;</p> <p>10 that I am neither counsel for, related to, nor employed by</p> <p>11 any of the parties to the action in which this was taken;</p> <p>12 and, further, that I am not a relative or employee of any</p> <p>13 counsel or attorney employed by the parties hereto, nor</p> <p>14 financially or otherwise interested in the outcome of this</p> <p>15 action.</p> <p>16</p> <p>17 </p> <p>18</p> <p>19 KENNETH KATZ</p> <p>20 Notary Public in and for the</p> <p>21 State of New York</p> <p>22</p> <p>23 [X] Review of the transcript was requested.</p> <p>24</p> <p>25</p>

37 (Pages 142 - 145)

Page 146

1 CERTIFICATE OF TRANSCRIBER

2 I, BENJAMIN GRAHAM, do hereby certify that this
 3 transcript was prepared from the digital audio recording of
 4 the foregoing proceeding, that said transcript is a true
 5 and accurate record of the proceedings to the best of my
 6 knowledge, skills, and ability; that I am neither counsel
 7 for, related to, nor employed by any of the parties to the
 8 action in which this was taken; and, further, that I am not
 9 a relative or employee of any counsel or attorney employed
 10 by the parties hereto, nor financially or otherwise
 11 interested in the outcome of this action.

12
 13
 14 

15
 16 BENJAMIN GRAHAM
 17
 18
 19
 20
 21
 22
 23
 24
 25

Page 147

1 ERRATA SHEET
 2 VERITEXT LEGAL SOLUTIONS
 3 330 OLD COUNTRY ROAD
 4 MINEOLA, NEW YORK 11501
 5 516-608-2400

6 NAME OF CASE: Blackchain Technologies Corp. v.
 7 RVH, Inc.
 8 NAME OF DEPONENT: NIKOLAOS SPANOS
 9 DATE OF DEPOSITION: 3/9/2020

10 PAGE LINE(S) CHANGE REASON

11				
12				
13				
14				
15				
16				
17				
18				
19				
20				

21 _____
 22 NIKOLAOS SPANOS

23 SUBSCRIBED AND SWORN TO BEFORE ME

24 THIS ____ DAY OF _____, 202__.

25 _____
 (NOTARY PUBLIC) MY COMMISSION EXPIRES:

38 (Pages 146 - 147)

[& - advisement]

Page 1

&	17929 146:14	32nd 3:13	able 13:25 27:2
& 3:12	18 71:9,10 73:22	330 147:2	37:4 96:5
0	1:08 116:21	4	absent 5:19
000290000297	1:14 116:24	40 53:5,7 98:16	absolutely 75:20
21:21	1:18 1:8	100:7 107:13	accepted 117:16
000991 82:24	1:37 137:14	4019160 2:7	access 60:24 61:5
000993 82:24	1:43 137:17	45 90:24 91:4,19	61:18,20 62:12,14
09352 1:9	1:51 144:10,12	94:18 95:15	64:2,8 65:8,18
1	2	5	111:12,15,25
10 96:5 137:9	2 69:4	5 126:14,20 127:2	112:3
100 2:4 3:5 5:17	20 73:22 100:8	127:12,19,24	accountant 120:15
10005 5:18	20,000 114:8 120:9	128:21 129:2	120:16
10005-3708 2:5	200 107:12 133:17	139:14,20	accurate 145:8
3:6	200,000 115:14	50 107:13 143:2	146:5
10019 3:14	20069 145:17	500 107:12	accurately 114:15
101 4:9	2009 71:8	51 68:5,9	acknowledgeme...
1044 69:5	2011 90:21	516-608-2400	5:5
105,000 122:22	2012 90:20,21,23	147:3	acting 130:12
133:6	2013 90:21,23	55 71:19 82:17	action 7:12 145:11
1099 69:8,10,20	2018 69:20,22 70:7	6	145:15 146:8,11
1099s 122:4,5	70:10,16,25 71:6	660-3059 3:16	ad 79:20
10:28 1:23 2:2	71:21 85:24	7	add 134:16
5:16	2019 88:23 91:15	7 4:3	addiction 106:23
10:29 7:3	92:9,10	78 101:8 103:10	addition 101:17
10:30 7:6	202 147:23	104:13,14	101:25 102:2,7
10:32 8:19	2020 1:22 2:1 5:16	8	additional 116:11
10:33 8:22	88:19,20 144:19	80 104:2	120:10
11501 147:2	20th 2:4 3:5 5:17	81 4:8	address 71:19
11:08 35:5	21 4:7	9	95:14 111:13,16
11:19 35:8	212 3:8,16	9 1:22 2:1 5:16	112:4
11:25 39:25	24 63:9	965-4526 3:8	administer 5:6
11:26 40:4	250,000 122:22	a	adrian 139:6
11:53 62:24	133:6,9,18	a.m. 1:23 2:2 5:16	advance 84:3
11:58 63:3,3	293 21:25 22:2	7:3,6 8:19,22 35:5	85:12
12 24:12	3	35:8 39:25 40:4	advertisement
12,000 50:21	3/9/2020 147:5	62:24 63:3	79:3 89:12
12:28 88:3	30 98:16 100:8	ability 8:10 134:11	advertisements
12:36 88:6	300 107:12,13	145:9 146:6	78:25
1633 3:13	300,000 115:15		advice 40:25 41:5
			advisement 28:17

[advisor - aver]

Page 2

advisor 41:6	amorphous 52:21	anyone's 117:19	52:7 53:13 62:14
advisory 22:16,24	amount 120:9	142:17	75:16 80:8 101:25
23:2,8 24:5,8,14	141:6	anyway 57:2	107:18 109:25
24:16,20 40:23	amounts 141:5	63:24,24 98:8	110:17 113:21,23
affiliated 25:21	anarchical 97:13	114:13	114:12,15 122:16
26:7 35:24 38:5	andy 22:19 40:14	apologize 76:17	124:13 126:24
39:17 40:6 47:9	40:18,23	82:4 110:12	128:2
50:12 54:24 55:3	angry 73:2 81:21	apparently 29:19	asks 96:3
55:7,15 66:14,19	annually 103:15	34:2	aspects 129:22
107:4 115:22,25	answer 7:18,24	appear 82:25	assets 16:21
124:20 125:2,15	8:2,8,11 12:19	appearing 6:8	assigned 5:3
125:25 136:25	19:5,6,7 26:10,14	appears 21:21	associate 137:2
affiliation 46:4,8	27:18,20 28:2,21	102:21	associated 35:21
46:15,17,18	31:24 33:6 36:5	applicable 5:25	80:11 136:15,19
107:20	36:18 37:19 43:11	appropriate 76:4	assume 8:6 95:24
afield 132:16	43:11,16,22 50:24	approximately	assumes 31:19
aggregate 120:9	51:19,23 52:6,16	9:17	39:2,6 55:17 64:4
ago 9:18 45:17	52:18 54:3,5	apps 32:21,25 33:3	68:8,8,19 78:15
53:4 56:24 64:25	55:20 58:2 62:10	67:15 112:22	85:9
65:6 66:22,23	63:15 65:15,15	arena 34:5	assuming 62:7,14
72:14 73:5,13,24	69:13,16 71:14,16	argument 84:23	127:18
74:2,5 94:6	71:17 72:9 73:13	85:15	attach 133:14
113:15 116:4	75:18,22 83:17	arguments 124:5	attempt 61:23
123:10,12	89:19,21 93:4	armenia 42:3	attendance 6:8
agree 5:21 41:22	102:6 114:11,20	84:14	attention 87:17
ahead 37:24	115:2,4 118:21	armenian 44:20	attest 32:8 83:8
aid 108:9	123:2,21 124:10	139:6	attorney 7:21,23
ajn 1:9	125:19 126:6,24	armenians 42:21	37:15 61:24,25
akbari 22:18	131:5,7,17	42:24	62:5 115:5 145:13
35:18,21,24 36:3	answered 59:13	article 143:2	146:9
37:5,21 38:17,21	62:16 113:25	articles 138:8	attorneys 60:5,9
39:5,9,16 40:6	114:21	asian 85:16	60:16 130:6,9,12
alan 3:3 6:12 7:9	answering 92:22	asked 34:4,5,7	130:13
alan.heller 3:7	114:14,14	59:12 63:16 71:25	audible 32:5,21
alcohol 98:6	answers 79:14	72:13,22 73:4,11	audio 145:7 146:3
allen 17:10 136:6	anticipate 8:7	73:24 74:4,6	auditory 67:15
136:10,14,17,19	anybody 32:20	104:5 110:8,9	authorized 5:5
136:22,24	106:20	112:18 135:17	137:2 138:12
allow 77:4	anymore 49:25	137:24,25	aver 24:8
allowed 139:24	111:8	asking 18:25 31:9	
		33:9,11 51:11,14	

[b - bunch]

Page 3

b	belarus 42:3 100:13,14	103:15 107:5,8,17 107:22 118:4	106:8
b 1:17 4:5,8 5:15	belarusian 44:19	119:7	booths 98:24
81:17,18 119:20	belarusians 42:20	bitcoiner 94:2	104:7,8,10,21
120:8 125:12	42:22 43:4 44:4	blackchain 147:4	105:6,7,10,14
back 7:5 8:21	57:16	blew 45:5	boss 87:2
10:17 23:15,25	believe 11:18 12:7	blockchain 1:4 4:8	bottom 22:3
24:13 35:7 40:3	72:24 83:20 95:23	5:9 29:19 47:18	bought 95:17,22
63:2,4 75:22 88:5	96:8 100:23 103:5	47:21,24 48:14	138:6
94:6 110:20	114:15 127:3	53:23 54:21 70:5	bountied 142:14
116:23 135:5,5	128:22 129:9	70:8,13,17,19,25	143:3
137:16 144:2	139:15,16 142:22	71:7,13,24 83:2,21	bounties 117:8,11
backend 86:10	believed 18:6	84:9,21 86:2,6,16	118:3,8 139:10
bad 29:17 56:25	belorussia 84:13	86:17,19,20,23	141:13
banner 98:15	ben 17:7,7 20:13	118:13,23 119:2,5	bounty 117:16
bar 95:16	20:14 46:2,4,6	119:6,16,17	123:9 139:9,11
based 58:14	47:20 48:18,21	120:11,24 121:6,8	bounty's 143:4
basement 90:25	49:24 50:9,11	121:10,14,14,16	box 107:20
91:5	53:2,3,8 54:23,23	121:22,23,23	brain 19:11,14
bases 129:25	55:6,6 58:18	122:10,11 124:24	104:19
basic 62:12	114:17 139:25,25	125:5 126:13	branch 117:16
bates 21:21 82:24	140:6	127:11,19 128:18	break 54:15 116:9
bathroom 35:4	beneath 76:23	128:20,25 129:18	breathe 105:23
62:19,20 63:22,23	benjamin 146:2	blogosphere 124:2	brilliant 117:24
81:21,22 82:3,12	146:16	124:3	bring 93:11,12
87:19,22 116:14	best 8:10,15 42:5	blood 114:7	134:10
befriended 133:11	54:18 106:6 134:3	blur 100:22 105:6	broad 52:5 60:2
begged 119:4	145:9 146:5	board 10:11,13,19	broadway 3:13
beginning 6:9	better 88:25	10:22,25 11:7,10	brought 71:4
18:17,20 19:17,19	117:21	13:5,7,9,21 14:3	btc 82:24,24
19:22,23,25 20:7	big 105:23 117:18	14:10,13,20,22	build 42:18 118:14
20:13 33:20,22	bill 4:8 122:14	15:2,5,14,21 16:2	building 118:24
90:8 91:12	bind 54:7	16:4 22:16,24	built 117:4
behalf 3:2,10 36:4	bit 22:6	23:3,9 24:5,8,14	bullhorn 34:2
37:22 49:6,7 50:3	bitcoin 39:17 40:7	24:16,20 40:24	bunch 7:13 20:15
50:7,20 51:2,6	40:11 41:19,19,22	140:9,10	42:11,20,20 43:20
53:7 56:8 58:22	44:4,9,10,11 45:14	bombing 49:18	45:12 46:3,3 56:3
66:21 71:25 73:5	46:5,10,16 47:12	booth 98:19,21,22	80:22 89:3,24
73:8 78:20 79:10	47:15 53:4,6,11	99:3 102:22,24	97:14 107:22
79:18 84:9 99:23	56:23 74:25 77:25	103:3,17,19 104:5	113:18 114:2
99:24 100:2,4	77:25 89:25 94:11	105:8,21,22,25	117:6
120:13 142:7,12			

[business - continue]

Page 4

business 53:8,18 53:22 54:20,22 55:6,8,22,23,25 56:9,15,16 110:4 112:4 134:12	centralized 138:10 certain 8:14 36:7 37:4 103:6 117:24 certificate 145:1 146:1 certified 5:21 certify 145:3 146:2 change 57:17 147:6 changed 57:16 changes 10:6 characters 20:19 charbovich 139:5 charge 81:13 93:23 chart 20:22 57:15 59:5,10 79:22 cheaper 84:12,14 85:16 check 87:15 128:24 139:19 checked 129:4 checks 122:5,6,10 122:11 chief 87:4,7,11 chinese 29:14 city 40:7,12 68:6 68:15,16 71:23,24 72:5,17 90:20 99:11 103:3,4,15 103:20 107:5 110:22 111:10 130:6 clarify 63:13,14 clear 47:7,8 50:23 110:21 clearly 50:23 client 52:15 62:5 75:18 76:8,13,17 77:4,14 115:5	116:10 clufetos 11:3 13:23 14:6 65:4 66:3 67:13 74:20 code 118:7 coding 84:6,16,16 86:10 cofounder 11:22 11:23 12:10,15,18 16:23,25 17:8,10 17:20 18:3,4,6,12 18:19,24 19:10,10 19:16 cofounders 17:2 17:13,23 coin 59:16,19 60:6 60:17,25 61:7 65:9 combs 22:18 25:20 27:5,8,14 come 23:4 33:5 75:22 comes 89:25 105:24 coming 40:10 commission 147:25 communicate 31:16,22,25 32:3 74:12 communicated 32:10,19 42:7 112:6,18,25 communication 74:8,9,10 117:18 community 20:15 20:16 34:3 67:2,6 79:24 142:20 companies 70:24 141:24	company 20:8,18 50:10 69:3,5,8,20 70:11,19 80:20 105:13 110:19 111:7 124:20,23 128:4 133:22 139:15 compensated 38:8 40:11 66:15,20 108:13 138:18 compensation 47:14,17,20,23 124:16,21,23 complete 8:8 computer 80:5 113:12 141:8 concluded 144:13 conference 42:10 42:10,12,14,16,18 43:6 44:23 82:2 confident 19:6,6 confused 56:4 connecticut 108:22,22 connection 7:14 7:16 12:5 32:11 47:5 55:15 59:18 60:5 61:6 64:20 76:25 77:9 78:3 78:13 83:5 122:7 122:9,13 123:13 124:17 125:11,15 127:6 130:6,10,14 130:18,23 132:9 consensus 80:24 85:14,20 constitute 6:5 constitutes 41:2 context 55:25 continue 30:11,14
--	---	---	---

[contract - dixon]

Page 5

contract 50:10	23:24 24:3 34:25	120:20 122:17	describe 27:10
control 94:4,4	35:5,7 39:24 40:3	140:11,15 144:19	description 4:6
96:18,19 138:9,10	62:23 63:2 88:2,5	147:23	26:11 27:3
conversation	116:20,23 137:11	dead 122:23	design 96:20
28:25 29:4	137:13,16 143:21	decentralists	designs 124:4
converted 95:22	143:25 144:3,9	90:16	destroyed 134:22
cookers 49:19	crazy 135:13	decentralized	determine 128:25
copies 112:9	create 131:15	20:18 90:15 93:6	developer 118:3
copy 82:14 101:22	created 14:19	118:2	devices 111:13,15
coronavirus	120:4 123:20	decide 116:11	112:4
114:10	127:7 138:22	decision 58:24	die 114:9
corp 83:2 84:21	creation 11:16	141:25 142:11	different 22:6
121:17 127:11	16:15,18 130:10	decisions 80:10,15	33:18 86:9 95:8
147:4	131:13	142:3	102:25 111:9
corporate 81:4	creative 57:4,7,13	deck 102:6	122:17
124:14	57:22 58:15,19	default 41:15,18	difficult 52:20
corporation 1:5	94:3,4	44:11 107:19,20	61:14
5:10 70:14,17,23	creator 118:4	107:23	dig 30:9,12,13,16
71:7 86:18,23	credit 12:2,3,6	defendant 1:7	digital 145:7 146:3
109:21 118:13,24	crowd 105:23	5:10 102:19	digs 30:9
119:3 120:24	cryptocurrency	defendant's 21:5	dimensional 73:20
121:6,10 128:18	95:21,22 96:6	120:8	73:21
128:20 129:19	97:13 117:17	defendants 1:10	direct 75:18
correct 11:7,21	curated 94:5	1:19 3:2 5:12,15	directed 44:15
51:24 72:25 97:25	currently 11:5	7:11	76:14,16
corrected 131:4	25:8,10 64:16,19	define 47:9 52:13	director 57:4,7,13
correctly 71:5	65:23 69:2 78:12	53:18 88:24	57:22 58:15,19
counsel 4:11 83:4	79:4 107:24 108:3	defined 51:15	64:16 107:25
119:23 145:10,13	141:10	definition 19:11	108:3,7
146:6,9	cv 1:8	46:18 49:4 80:3	disagree 52:22
count 107:9 114:7	d	87:11 90:16 92:3	discuss 75:22
counterclaim 1:7	d 1:17 4:1 5:15	104:3	76:21
1:11 5:10,12 7:11	dane 44:20	denmark 61:3	discussed 45:13
countries 102:25	danish 11:3 20:10	depending 139:9	132:23
country 15:8 94:7	45:25 66:4 74:19	depends 44:17	disorganized
98:25 147:2	danny 22:20	92:2	97:12
couple 71:12	date 1:22 2:1	deponent 147:4	distinguished 89:8
98:15 100:8	53:14 85:23	deposition 1:21	distracting 8:14
court 1:1 5:2 6:13	138:22 147:5	5:8 6:3 7:15 8:7	district 1:1,2
6:20,23 7:2,5,14	day 45:18 53:9,17	30:15 75:11 135:2	dixon 47:23 48:3
8:3,18,21 21:3	107:14,14,14	147:5	48:13,18,21,23

[dixon - enthusiasts]

Page 6

49:5,10,12,16 115:13 140:23 dizzy 114:5 doctor 139:4,5 document 21:17 21:20 23:11 60:19 83:7 102:18 120:5 documents 59:18 59:22 60:15,17,25 61:5,6,12,19,24 65:9 82:24 83:6 83:13,14,19 119:23 123:6 126:23 doesn't 101:23 doing 52:8,12 100:21 101:5 133:13 dollars 119:9 142:23 domain 9:6,7 don't 7:19 9:14,15 9:19 10:4,4,4,5,6,7 10:10,10 11:4,6,12 11:15 12:12,22 13:11,11,18,24 14:4,24 15:4,4,7 15:12,18 16:22 17:3,3,5,5,15,25 18:4,23,23 19:10 19:11,24 20:9,10 20:12,25 21:10 23:6,19 24:2 25:22,22 26:10,13 26:16,24 27:11,17 28:11,23 29:21,21 30:8 31:8,12,12,13 32:4,7,8,24 33:7 33:12,18,24 34:10 34:11,11,18 36:6 36:25 38:18,18,22	38:24 39:23 40:13 40:19,22 41:5 42:6,23 43:3 44:18,24 45:2,8,12 45:17,25 46:9 47:13,16,19,25,25 48:2,15,16 49:2,9 49:9,17,17,20,22 49:23,23,25 50:10 50:24 51:6,10,17 52:6 55:4,13 56:4 56:18,19,19,21,25 58:21,21 60:10,12 60:21,21 61:16,16 61:25 63:17 64:25 65:21 66:4,5,6,8,9 66:12,25 67:17 68:25 69:11,12 70:3 72:6,10,24 73:10,19 74:2,7,13 74:14,14,18 75:8 78:5,6,8,9,9,10 79:2,3,21 80:3,17 80:20 81:2,7,8 82:2 83:7,8,11,23 83:23,25 84:4,17 85:23,24,24 86:9 86:11,12 87:2,2,5 87:5,16 88:15,15 88:17,22 89:4,4,10 89:22 90:8,10 92:4,9,12,14,21 94:4,9 95:25 96:6 96:14 97:17,18,20 99:4,5,8,11,17 100:14,19 101:4,9 102:9 103:6,18,22 104:2,9,11,11,15 104:22,23,25 106:5,21,22 107:10,21 108:2,5	108:19,21 109:4 110:25 111:11,11 112:2,5 113:3,7,9 113:12,15,25 114:19,20 115:7 116:7 117:10 118:9,10 119:2,10 119:15 120:2,16 121:2,2,3,5,5,17 121:18,18,24,25 123:3,5,7,9,10,10 123:11,15,21,22 125:3,3,19 126:10 126:15,16 127:16 128:9,11,15,16,22 128:23 131:15,25 133:7 134:25 135:3 136:13 137:4,6 138:5 139:16 140:5,8,12 140:20,21 141:2,3 141:3,4,12,23 142:14,15,16,16 142:16,17,19 143:8 doors 46:24 dozens 96:16 99:10,10,10 102:24 drank 62:21 drink 95:22,23 drinks 92:3,6 95:17,20 drop 29:16 duly 6:17 145:5 duties 80:8 dwayne 22:19 24:23 25:5	e e 3:1,1 4:1,5 46:7 111:19 115:18,20 early 89:25 90:23 east 29:15 effort 129:8 eight 21:20 22:4,5 24:6,16,19 41:10 104:16,18 either 7:23 31:13 38:8 44:19 51:7 61:15 128:14 139:15 electronic 60:22 60:24 61:6,18,24 64:3,8 65:8,18 111:12,15 112:3,9 112:13,17 electronically 32:10,19 112:7,18 email 32:7,9 113:2 113:4,7,22,24,24 114:2,3 115:7 emails 98:9,9 112:9,13,17 113:5 113:18,20 114:17 114:19,20 115:10 115:15,15 employed 109:5 145:10,13 146:7,9 employee 145:12 146:9 encryption 86:10 enforced 92:25 93:4,5,7 engaged 86:15 138:18 enter 117:15 entered 27:4,7 enthusiasts 97:13
---	--	---	--

[entire - formed]

Page 7

entire 23:11	64:5 68:8,20	eyes 32:6 61:11	finish 8:11 18:9
entities 69:25	78:16 125:4	eyesight 61:8	19:2 22:11 32:13
entitled 76:2	evidentiary 6:2	f	46:11 47:6 48:6
entity 8:25 9:2	exact 26:11 45:17	faces 27:22,24	50:13,14 79:8
50:11 53:8,21,22	83:7 86:11 104:12	28:6,6,12,19	83:16 84:24 91:21
54:23 55:3,7,15	exactly 9:14 10:5	fact 28:18 29:11	92:16 99:18
56:8 66:13,19	52:8 86:7 95:7	34:12	101:24 102:3,5
69:3,23 70:10	121:2	facts 31:20 39:3,7	118:17 125:7,20
78:20 94:13 109:6	examination 4:2	55:18 62:8 64:5	132:5
109:19 124:25	7:7	68:8,20 78:16	finished 48:9
125:14,24 126:9	examined 6:19	factually 69:16	firing 80:11,15,16
126:13,20,25	exclusive 93:14	faith 76:24 77:7,8	firm 7:10 20:17
127:23 130:2	excuse 26:16 28:3	familiar 8:24 9:3	first 6:17 51:17
132:9 139:25	42:17 49:11 52:3	9:20 41:12 53:3	76:7 84:2 107:3
eric 47:23 48:3,13	75:10 76:11	74:21 77:20,23	135:2
48:23 49:5,10,12	126:18 128:19	88:9 90:22,24	fit 97:11
49:16 115:13	129:7,15,23	106:10,13,17,18	five 126:2
140:23	143:14	106:19 115:17,21	floating 141:13
errata 147:1	executive 87:8,11	116:3,4 120:3,5	142:15
errors 133:16	exhibit 4:7,8,9	136:5	floor 2:4 3:5,13
es 145:4	21:7 81:18 101:18	fancies 117:25	5:17
esquire 3:3,11	119:20 120:8	far 132:16 138:18	florida 100:25
estate 109:17,18	125:12	fast 79:14	focusing 23:7,8
109:20,22 110:4,5	exhibits 4:11	faster 23:18	follow 52:6 76:3
110:19 111:7	existence 77:2	father's 122:23	followed 93:12
ethereum 17:23	exists 129:8,10	fax 28:22	follows 6:19
european 85:16	expenses 84:3 85:4	february 85:24	food 92:8,10
evan 22:20 115:18	85:6,12	feeling 18:8	foods 90:7
115:20	expires 147:25	felt 29:17	foregoing 145:3,4
event 93:21 94:18	explain 20:20 80:2	fight 84:11,15	146:4
94:20 95:5 96:9	80:7,8 81:8,11	figure 144:8	forgot 66:4,5 94:3
103:7 129:12	94:13 100:10	figured 29:13	form 17:14 18:13
events 91:17,24	105:11,14,21	filed 31:8	53:25 54:14 56:2
96:10,20,20,21	106:8 124:13	files 64:3,8 65:18	65:11,20 127:25
97:24 98:5,7	137:25 138:7	65:19	formation 13:20
103:12 104:6	explained 105:17	filings 60:25	130:7,14,19,23
141:19,21	explaining 137:24	financially 145:14	131:19,23 133:22
everybody 92:23	express 81:4	146:10	formed 13:9 14:14
123:25,25	eye 22:8 114:6	find 143:7,7	14:18 15:16,22
evidence 31:20	eyeballs 32:5	fine 18:15 23:12	16:3,6,6,7,14,17
39:3,7 55:18 62:8		23:25 71:6,6 82:4	132:10

[foster - gives]

Page 8

foster 2:3 3:4 5:16 7:10	137:3 138:12,21 142:11,12	getting 51:22 140:7 142:17 144:3,4	90:5 91:20 92:16 93:3 96:24 97:3,8 98:10 99:18 100:4 100:18,20,24 101:3,5,24 102:5 102:14 103:8 104:16,20 105:15 110:6,9 111:17 112:12,16,20 114:23,24 116:13 118:17 119:19 124:10 125:7,20 126:3,18,22 127:4 127:8,14,21,25 128:7,11,14 129:3 129:7,15,20,23 131:5,7,11,17 132:5,15,21,25 134:18 135:7,11 135:20,23,25 136:7 140:12,16 143:12,15,19 144:2,5,7
foster.com 3:7	foundations 96:5	ginsberg 6:11,11 9:13 10:18 13:14 13:16 15:20 16:5 17:14 18:14 19:2 20:3 22:9,11 23:10,17 24:24 25:3,13,24 26:16 27:6,21 28:3,8,11 29:23 30:4,11,14 30:18,21 31:2,10 31:19 32:16 33:5 33:9 35:13 36:9 36:14,19,22 37:9 37:16,18,23 38:7 39:2,6 40:15 43:10,18,21 44:12 44:15 46:11 47:6 48:6,9,21 50:14 51:5,9,14,21,24 52:3,18,20 53:9,13 53:18,25 54:4,13 54:17 55:17,21 56:2,15 57:10,12 57:19,21,24 58:3,8 58:11,14 59:9,12 59:24 62:2,4,7,11 63:7,14,18,19,21 64:4,10,12 65:11 65:20 67:23 68:7 68:11,19 69:4,10 69:13 71:17 72:6 72:18,21,24 73:11 75:3,5,10,15,24 76:7,11,14,20 77:6 77:12,15 78:7,15 79:7,12 81:12,14 82:14,19 84:24 85:9,13 89:13,18	ginsburg 3:11 girl 113:9 girlfriend 109:4 girls 56:13 github 117:15 118:8 give 17:20 43:16 44:2 50:23 54:6 61:24 76:11 79:14 93:8 113:17,18 124:13 126:3 133:5 134:4,6,8 135:21 137:9 139:22 140:8 given 40:25 140:2 141:7 gives 52:6
found 29:9 57:18 77:9 113:5 133:16	founded 11:10 12:24		
foundation 1:17 5:15 9:8,9,10,11 10:9,23 11:2,9,11 13:10,22 14:11,19 15:3 16:3,14,17,21 16:24 24:17,20 25:21 27:15 31:17 31:23 32:2,20 35:11,22 36:4,8 37:6 40:24 41:25 42:7 43:5 48:19 48:25 49:6,7 50:3 50:8,20 51:3,17 53:24 55:8,16 56:9 57:5 58:20 58:22,25 59:15,20 60:7,18 61:2,7 64:2,3,7,9,17,20 65:7,10,17,19,24 66:16,21 72:14 73:6,9,13 74:5 77:11 78:3,14 79:10,19 80:12,15 82:25 83:20 84:8 84:10,19 86:3,6,13 86:15,20 87:14 96:3,3 99:25 107:25 108:7,14 115:23 117:17 119:3,16,17 120:10,25 121:7 121:13 122:13 123:13 127:9 130:7 131:24 133:23 135:5 136:15,20,25	founder 11:20 29:10,21,22 founders 17:24 four 22:5 41:9 123:11 frankly 12:12 friend 35:19 39:10 frightened 79:17 front 20:11 26:14 27:13 41:8 102:22 103:3,9 120:20 125:6 fulfilled 139:10 further 141:14 145:12 146:8 fyi 25:6		
	g		
	g 46:7 111:19 gap 117:18 garvey 2:3 3:4 5:16 7:10 gas 122:23 gathering 93:24 geez 56:25 general 17:19 51:15 generation 123:18 124:17 gentleman 134:22 geographically 51:11 geros 46:7,15 47:11,14 111:16 111:19 112:4,6,10 112:14,17,25 113:5,20		

[giving - herskowitz]

Page 9

giving 45:9 63:18 63:19 133:9	great 134:10	heck 27:3	78:11,18 79:9,15
global 34:5	ground 114:8	held 12:14	81:17,24 82:4,8,10
go 6:21 10:16	group 72:2 74:24 89:25 93:11	hell 34:4 96:7 98:9	82:16,22 85:3,17
23:25 24:13 26:21	grunt 8:5	heller 3:3 4:3 6:12	88:7 89:16,20
35:3 37:24 39:18	guess 78:7 96:25	6:12,21,25 7:8,9	90:11 91:23 92:19
39:20,21 51:10	100:18 105:16	8:23 9:16 10:21	93:15 97:22 98:12
52:17 62:18,20	140:13	13:19 15:23 16:2	99:21 100:11
63:22,23 75:21	guidance 67:5	16:10,13 17:16	101:11,20 102:2
76:6,14,16,19	gun 134:5	18:18 19:3,13	102:11,16,17
81:20,22 82:3,12	guy 11:3 20:8,10	20:5 21:2,5,11,15	103:13 105:2,19
87:19,20,22	24:21,22 29:14,18	22:14 23:11,12,15	110:11 111:19,22
110:20 116:14	29:25 44:9 45:21	23:19,22,25 24:4	112:15,23,24
118:8 121:22	45:25 66:5 73:2	25:7,15,18,19 26:4	115:4,8 116:16,18
goes 29:15 44:11	74:19 79:17 90:7	26:18,20 27:9,21	117:2,3 118:20
62:13	90:9 106:15	27:24 28:5,8,10,16	119:21 124:15
going 7:2,13 8:9	108:11 116:7	28:20 30:8,20,24	125:10,23 126:7
17:6 23:17 24:13	117:24 126:5	31:4,15,21 32:18	126:19,25 127:6,9
29:14,15 30:9,10	131:9 139:4	33:14 34:24 35:9	127:17,22 128:5
34:20,25 39:24	guy's 66:4 140:10	35:15,17 36:11,16	128:17 129:5,13
41:2 62:23 63:4	guys 30:17 56:3	37:3,13,20 38:3,9	129:17,22 130:4
75:17,18 87:24	89:3,9 94:14	38:14 39:4,8,20	131:14,21 132:8
88:2 90:5 96:8	95:20 111:21	40:5,17 43:13,19	132:22 133:25
114:13 115:9	h	43:23 44:6,21	134:15,23 135:14
116:9,10,11,18,20	h 4:5	46:14 47:10 48:12	135:24 136:4,9
125:22 133:12	hand 107:10	48:22 50:18 51:13	137:5,9,12,18
135:15,18 137:11	handed 95:24	51:16,22 52:2,15	140:18 143:14,17
137:13 138:9	handicapped	52:19,22,25 53:10	143:24 144:6,8
140:10,21 143:18	123:23	53:16,20 54:2,9,12	help 71:4 118:14
144:9	handle 117:12	54:19 55:19,24	119:3 122:15
goldstein 22:19	happened 41:23	56:6 57:3 58:17	123:6 126:6
40:14,18,23	105:5 124:4	59:11,14 60:4	133:12
good 5:2 12:7,23	happens 96:2,22	62:6,9,16,20 63:12	helped 38:5,11
12:25 18:13 32:6	hard 25:4 92:2	63:25 64:6,11,13	helpful 50:17
33:20 39:10 61:12	hate 89:9,9	64:15 65:14,22	herding 97:15
76:24 77:6,8 96:4	head 143:8	68:2,4,10,13,21	hereto 145:13
100:6 108:11,11	hear 21:11 36:25	69:7,17 70:15	146:10
google 15:19	70:22	71:20 72:8,12,20	herskowitz 1:9,13
gotcha 112:23	heard 29:10	72:23 73:3,16	3:20 5:11,13 8:16
graham 146:2,16	hearing 6:13	75:8,14,20,24,25	9:21,24 10:2
		76:5,7,9,12,16,18	29:25 46:25 70:13
		77:5,8,13,16,19	122:21 132:3,24

[herskowitz - katz]

Page 10

133:4,5 135:22 137:7 herskowitz's 66:10 134:13 hesitant 19:5 hesitating 19:5,8 hey 33:25 93:25 heyman 22:19 high 114:6 hire 119:5 141:25 hired 80:17 83:20 84:9,21 86:6 141:14,19,24 hiring 80:11 hmm 25:2 64:11 64:13 75:14 88:21 89:15 140:16 142:25 hoc 79:20 hodgepodge 97:12 hold 23:24 37:11 45:21 47:11 86:22 113:11 holders 67:6 holding 12:18 63:23 holdings 34:5 hollander 22:20 25:5 hope 27:19 69:12 106:9,9 host 94:22 95:2,5 hosted 94:17,19 hosts 94:24 hotel 102:23 103:4 103:7 hotels 99:14 hours 87:18 house 21:14 84:16 how'd 106:17,18	how's 22:5 huh 13:15 122:8 126:12 human 40:20 hundred 17:23 36:6 38:20 101:7 101:9 103:24 104:13,22 120:4 142:22 hundreds 40:9 103:23 118:9 122:20 124:2 134:19,20 hurts 114:5 hype 17:4 hyped 17:12,17,19 hypertension 81:23 hypothetical 65:12 128:2 i ico 67:7 123:14,15 123:16,16,20 idea 11:14 72:7 75:4 95:10 98:5 114:18 ideas 95:9 identification 21:8 21:18 81:19 101:19 identifies 18:25 identify 6:8 identifying 18:24 19:9 imagine 95:18 implicitly 82:9 inaccurate 41:10 41:14 inappropriate 76:22	includes 112:21 incredible 79:25 80:2 118:5 indicated 93:20 individual 11:13 17:7 56:10 66:18 73:12 84:9 106:10 109:6 115:18 136:5,10,18,19,21 136:24 individually 53:7 55:2 56:8 individuals 22:21 22:23 24:12,15,16 24:19 31:16 42:8 90:17 91:3 93:20 105:12,21 130:18 130:24,25 131:23 137:22 138:11 141:7,25 industry 29:9 40:20 97:7,21 117:9,10,19,22,25 123:22 industry's 117:18 influencer 94:16 inhibited 134:11 initial 59:16,19 60:6,17,25 61:6 65:9 inquiry 75:17 76:21 inside 102:23 insight 12:8,23 intended 5:24 interest 70:8,17 interested 29:18 145:14 146:11 internet 124:3 interrupt 26:17,19	interrupted 89:17 102:8 interrupting 27:22 28:4,13 75:11 inventory 133:13 invited 103:12 invoice 86:8 119:15 invoices 82:25 120:8 involved 13:6,8 58:24 60:5 65:24 iorgos 11:3 44:19 58:21 isle 31:13 61:3 67:25 132:10 issue 61:8 issued 7:14 it'll 81:10 i'm 27:24 28:2 67:20 131:16 j jamaica 24:21,22 jeffries 94:2 jersey 49:15 108:19,21,22 job 2:7 27:3 107:21 118:5 john 34:4 jonathan 22:19 josh 94:2,3 jumped 29:12,12 jurisdiction 7:16 52:10 75:12 77:2 77:3 129:11,21,24 129:25 132:18 k k 1:16 5:14 katz 2:6 5:3 145:2 145:19
---	--	---	--

[keep - long]

Page 11

keep 31:5 90:5 114:13 123:16,20 125:22 131:6 kenneth 2:6 5:3 145:2,19 kind 32:4 95:20 97:20 117:16 124:13 kinds 17:20 95:12 know 7:24 8:13 9:13,15,17 10:4,5 10:5 11:4,6 12:13 12:25 13:5 14:24 15:4,4,18 16:22 17:3,4,5,15,25 18:4,23 19:23,24 20:12,15,16,19 21:6 24:13 25:22 26:13,24 27:3,3 28:23,23,24,25 29:7,8,9,19,21,21 30:2 31:8,8,11,12 31:13,14 32:4,24 33:8,18,24,25 34:11,11,18,22 36:6,7 38:18,22,24 40:19,22 41:3,4,5 41:15,17,17 42:6 42:17,23 43:7 44:18,18 45:2,9,25 46:9,24 47:25,25 47:25 49:9,17,17 49:20,22,23,23,25 50:10,10,17 51:5,6 54:10 56:4,19,21 56:22,24,24 58:18 58:21,21 59:25 60:10 61:15,16,20 63:6,12,17 64:10 64:25 65:15,17,21 65:23 66:4,5,8,9	66:25 67:3 69:12 69:16 70:3 72:10 73:19 74:14 78:2 78:5,6,9,10,21,22 79:2,3,21,22 80:3 80:5,14,23 81:7,8 83:8,11,23 84:4,8 84:11,12,18,19 85:15 86:9,12 87:2,2,5,5,6,9 88:15,15,17 89:4,9 89:10,23 90:8,10 90:12 91:13 92:4 92:4,14,24 93:6,9 93:11,17,25 94:4,7 94:10,12,17,24 95:12,13,13,25 96:4,7,14 97:6,10 97:12,16,19 98:17 99:12 100:14 101:8 103:14,22 104:2,6,8,9,11,14 104:15 105:3,8,15 106:5,21,22 107:11,21 108:16 108:18,19,20,21 108:25,25 109:4,5 109:8 110:17 112:2,5 113:3,15 114:4,16 115:14 115:22,25 116:4,8 118:9,10,11 119:2 119:10,13,14,22 120:7,16 121:2,2,5 121:18,18,25 122:18 123:3,5,6 123:12,15,15,21 123:22,22,25 124:5,8 125:19 126:16,24 127:15 128:4,6,7,14 133:7	134:12,25 135:3 136:13,14 137:19 138:5 139:3,9 140:5,6,8,23,25 141:2,3,3,4,4,12 141:18 142:15,16 142:23 143:8,9,9 143:10 144:7 knowledge 42:5 58:14 106:6,7 138:17 141:16,18 145:9 146:6 knowledgeably 56:23 known 35:19 60:14 105:4 117:12,13 knows 64:12 75:25 118:4,6 kumail 22:18 35:18,21,24 36:3 37:4,21 38:21 39:22	laying 143:4 learned 105:5 leave 21:13 30:22 left 19:22 126:17 126:19 legal 147:1 lesson 81:7 libertarians 97:14 life 133:14 135:3 limited 7:15 75:11 75:17 lincoln 90:2,3 line 147:6 linkedin 11:20 12:10,12 list 24:6 listed 24:15 listen 50:21 79:12 88:24 100:22 101:4 105:22 142:3 lists 24:12 little 8:14 22:6 61:14 104:15 107:20 117:20,21 live 38:21,23,25 111:21 lived 39:11,14 lives 39:13 111:20 llp 3:12 lobbying 86:19,20 located 90:12 109:16 location 2:3 90:18 90:24 logo 96:8 long 10:2 35:19 64:22 65:6 66:9 96:7,10 101:13 102:6
I			
labor 84:12,14 lasik 32:7 late 90:23 laughing 115:6 laurent 106:11,14 106:15 107:4,7,24 108:6,13,16 109:5 109:11 110:13,21 115:10,11 laurent's 111:13 law 20:17 129:24 129:25 laws 6:2 lawsuit 83:5 lawyer 82:6,8 113:16,17			

[look - movie]

Page 12

look 21:10 23:11 34:22 94:23 99:14 101:23 121:23,24 126:5 140:20 141:9 looked 12:25 20:24 113:12 looks 102:23 loose 20:23 93:6 loosely 83:9 looser 20:17,18,21 20:21 lost 134:9 lot 21:13 22:8 23:17 30:24 56:11 56:23 67:20 70:3 70:23,24 81:13,16 81:22 82:3 87:10 89:4 103:16 113:24 117:8,8,10 118:7 122:16 134:9,17 137:21 138:3 love 27:2 lymphocytes 114:9 lysol 21:9	132:10 manhattan 49:21 49:22 manner 6:3 march 1:22 2:1 5:16 mark 21:2,4 81:17 marked 21:7,17 21:20 41:9 81:18 101:18 102:18 market 78:21 marketing 78:13 78:17,19,22 mathews 34:7 matt 22:20 matter 5:9 29:11 34:12 58:4 117:13 matthews 34:4 mean 18:8 19:24 20:19 23:13 30:3 30:3 34:23 38:2 40:19,22 43:21 47:9 48:16 50:9 50:24 53:14 55:13 56:19 58:6 59:23 60:19 66:3,9,22,25 67:6,23 71:3 73:20 74:14 78:21 78:22,24 79:2,20 80:3 89:8 92:2,4,5 92:24 94:24 96:22 97:10,14,18 103:21 104:12 106:22 114:4 119:11,14 121:3 121:18,24 122:4 122:16 129:3 132:17 137:25 141:3 meaning 46:18 96:21 101:10	108:8,10 139:23 means 6:4 18:4 51:6 54:8 72:7,11 89:10 93:25 95:9 media 138:8 medicine 63:6 81:22 meet 74:25 75:2 77:24 90:17,19 91:4 106:18 111:9 meeting 14:10,13 14:20,23 15:2,5,14 15:21 16:3,4 110:3,7 124:5,8,9 132:13,23 133:5 133:21 134:4 meetings 56:14 130:5,9,13,17 131:12,18,22 132:2,12 meetup 90:8 92:13 93:10 meetups 91:24 92:11 member 20:16 23:2 members 10:11 13:4,5,7,9,21 14:3 20:15 22:23 memory 44:2 99:8 122:16 mentally 21:13 mentioned 18:5 45:13 59:4 71:21 71:22 88:9 mentions 22:15,18 met 9:23 10:2 91:4 91:7,10,11 106:16 106:24,24,24 109:23,24 110:21	microphone 94:20 middle 84:2 million 114:8 126:2,14,20 127:2 127:12,20,24 128:21 129:2 139:14,20 mind 18:7,11 mine 35:19 52:24 134:11 mineola 147:2 minute 51:5 68:7 89:13 116:9,10 minutes 14:22,25 15:2 63:9 137:8 137:10 misconceptions 117:9 misguided 52:11 mm 64:13 75:14 88:21 140:16 142:25 moment 41:15 138:14,15 monday 1:22 2:1 5:16 107:12,13 money 81:13 93:8 120:10 134:4,6 138:7 months 66:22,23 72:14 73:5,13,24 74:2,5 113:15 morning 5:2 mott 90:25 91:4 94:18 95:15 mouth 131:6 move 52:14,16 moved 94:7 movie 18:16
m			
mad 33:12,13 mailbox 115:16 maintain 68:16,18 69:22,25 70:4,7,16 71:2 112:9 maintains 109:8 majority 67:18,21 68:3 making 25:14 27:22,24 28:5,6,9 28:12,18 man 31:13 61:3 67:25 105:24			

[n - office]

Page 13

n	123:1 124:1 125:1 126:1 127:1 128:1 129:1 130:1 131:1 132:1 133:1 134:1 135:1 136:1 137:1 138:1 139:1 140:1 141:1 142:1 143:1 144:1	new 1:2 2:5 3:6,14 5:6,17,17 15:11 38:23,25 39:14 40:7,12 49:15 67:23,24 68:6,15 68:16 71:23,24 72:5,16 77:3 90:20 99:3,15,22 100:16,21,23 101:5,10,15 103:3 103:4,9,15,20,24 104:9,22 107:5 108:19,21,21,22 108:22 110:22 111:10 117:9 129:18 130:6,10 130:14,18,25 131:12,18,23 132:3 133:3 145:21 147:2	noon 63:7,7 north 90:3,19 notary 2:6 5:5 144:23 145:1,20 147:25 note 37:14 nuanced 123:8 number 104:12 ny 2:5 3:6,14
n 3:1 4:1 5:1 6:1 7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1 56:1 57:1 58:1 59:1 60:1 61:1 62:1 63:1 64:1 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1 80:1 81:1 82:1 83:1 84:1 85:1 86:1 87:1 88:1 89:1 90:1 91:1 92:1 93:1 94:1 95:1 96:1 97:1 98:1 99:1 100:1 101:1 102:1 103:1 104:1 105:1 106:1 107:1 108:1 109:1 110:1 111:1 112:1 113:1 114:1 115:1 115:18,20 116:1 117:1 118:1 119:1 120:1 121:1 122:1	nakamoto 118:6 name 5:2 7:9 8:25 9:6,7,9 11:4,6 13:25 17:7 20:9,9 20:11 29:20,22,23 34:4 40:16 66:4,5 66:8,10 70:11,24 89:5 92:23,24 93:10,22 94:3 96:4,23 104:24 106:11 111:18 115:18,19 116:3 117:7 135:10 136:6,10,11,16,17 147:4,4 named 45:21 118:5 names 13:17,23 60:9 96:5 135:13 nasty 30:10 nation 118:2 nature 20:16 118:2 need 82:2,3,11 needs 8:5 negative 36:6 neither 145:10 146:6 never 18:15 21:24 23:13 29:10 44:9 79:21 95:13 110:18 118:11 119:11,12	nice 22:13 nick 1:16 5:14 17:10 44:12 57:19 58:8 59:24 89:14 90:5 91:20 99:19 101:3 103:8 124:10 126:3 135:20,23 136:6 136:10,14,16,19 136:22,24 night 94:24 nikolaos 1:16,21 3:10 5:8,14 6:10 6:16 144:16 147:4 147:21 nod 8:5 noise 29:8 nomenclature 19:12 non 55:23	o o 46:7 111:19 115:18,20 oaths 5:6 object 27:25 28:18 35:10 48:21 51:16 objected 12:9,17 12:21 objection 5:19 6:14 7:23 15:20 17:14 27:6 28:9 28:10 31:19 39:2 39:6 51:6 53:25 55:17 56:2 62:4 64:4 65:11,20 68:8,19 72:6,18 75:3 78:15 85:9 110:6 112:12 127:25 132:25 objectionable 54:14 objects 7:21 occurred 43:16 51:11,12 123:18 offering 59:16,19 60:6,17 61:2,7 65:9 office 49:18,20 68:16,18,22 71:2,7 71:11,18,24 72:16 109:8,12,13,16,17 109:18,20,22,23

[office - people]

Page 14

110:4,5,10,13,14 110:15,18,22 111:4,6,9 officer 87:8,11 145:2 official 57:12 oh 10:4 13:4 22:10 22:13 25:18 26:2 26:6,15,25 28:24 29:16 33:11 34:21 36:13,21 42:17 44:4,11 46:13 48:8 58:13,13 61:21 63:8 69:19 70:3 74:2 82:17 83:18 84:4 85:13 85:23 88:15 91:2 93:7 119:2 127:5 132:7,14 134:17 140:21 okay 6:21 7:2 8:18 8:24 11:9,19,23 12:17,21 13:5,7,13 14:10,13,22 15:14 16:20 17:6,22 18:2,14 21:25 22:5,13 23:2,22,22 23:24 25:3 26:9 27:4 31:2 32:22 34:16 35:9 37:11 37:16 39:12,24 40:21 41:13 43:19 48:11 51:2 55:2 59:11 61:23 66:8 70:4 73:17 77:12 77:15 79:4,11,20 83:10 87:23 88:8 88:13,18 89:3 91:7,16 97:5,8 98:5,24 99:3 100:12 101:2	102:12 105:12 106:19 107:2,16 110:12,20,24 111:6 115:9 116:6 116:12 117:7 118:23 119:24 127:18 128:13 131:3 134:2,24 136:18 138:23 139:7 141:10 142:8,18,21 143:6 144:3,9 old 147:2 onboard 134:10 once 34:15 88:16 91:8 92:15,20 111:2 one's 66:7 ongoing 84:3,5,22 85:4,5,10,12 online 77:10 124:6 opaque 52:21 open 46:24 117:14 141:9 opinion 52:23 124:3 opposed 67:24 order 7:14 8:8 143:22 organization 58:4 130:2 135:10 142:9 organizational 20:22 57:15 59:5 59:7,10 79:22 organized 11:10 original 143:22 outcome 145:14 146:11 outside 49:19 75:21 76:21	owned 110:18 111:8 139:25 owners 10:8,11 ownership 9:12 69:22,25 70:4,7,16 owns 9:7 p p 3:1,1 p.m. 63:3 88:3,6 116:21,24 137:14 137:17 144:10,12 pad 140:15,19 page 4:2,6 12:11 12:12 21:20,25 23:7,7 24:11 41:9 84:2 87:17 147:6 pages 83:6 paid 46:18,20,22 48:3,13,16,18,24 49:2 50:4,19 73:15 79:2 87:14 98:6 105:13 119:3 119:6,9,17 120:10 121:8,15,17 129:18 138:24 139:12 142:17 paint 97:19 panama 90:9 paper 26:22 27:11 27:12 28:24 31:7 41:2,3,8 58:7,12 60:19,20,21 65:8 65:18 paperless 31:6 papers 63:19,21 paperwork 26:13 26:15,21 27:4,7,10 27:15 31:5,8 park 90:2,4 part 40:23 86:8 110:18 118:15,21	118:22 participate 29:3 43:7,9,14 44:16 45:10 53:21 participated 42:16 43:5 44:13,22 participating 42:15 particular 11:13 41:9 90:17 105:9 particularly 47:8 parties 5:20 145:11,13 146:7 146:10 parts 114:8 party 1:14,19 5:13 5:15 7:12 pay 34:12 85:4 86:13 95:19 98:2 133:18,19 142:13 payment 129:13 129:17 payments 125:4 pc 2:3 3:4 5:17 pee 58:23 pellets 61:11 pending 30:5,19 36:12,17,20,23 37:10 97:9 135:8 135:11 people 11:25 13:5 13:8 17:4,12,17,18 17:19 18:20 20:15 22:8 24:6 29:2 30:7 31:22 32:2 33:16,18,24 34:3 34:12 40:8,9 41:16 42:2,11,15 46:3,3 50:22 57:16 65:25 66:2 66:6 67:2 74:24
---	---	--	---

[people - proffer]

Page 15

77:24 80:3,22,25 85:21 87:11 89:24 89:25 92:22 93:6 93:11,12,13,24,24 96:22 97:6,20 107:12,12,13,14 107:23 109:22 113:25 117:6,10 118:9,10 121:25 124:2 134:9,9,9 135:12,18 137:21 138:3,6,8 140:9 people's 134:7 perceive 95:8 percent 36:6 38:20 68:5,9 101:7,8,9 103:10 104:13,14 104:16,18,22 120:4 percentage 135:22 perform 40:10 48:3,13,18,23 49:2 50:2,19,19 59:15 67:8 71:25 72:13 72:22 73:4,8,17,25 74:4 86:16 113:6 performed 36:3,8 37:5 38:4 48:5 66:14,20 67:9 72:4,17,19 73:12 86:2,5 113:4,8,10 period 120:23,23 permission 67:3,8 67:11 93:22 permitted 5:24 permitting 7:15 person 14:8 38:20 41:17 66:6 134:25 personal 55:22 81:25 97:17 109:18,20	personally 98:3 120:6 125:14 126:8,10 127:11 127:18 139:12,17 143:5 peter 3:11 6:11 30:8 35:9 pginsberg 3:15 phone 15:9,10,10 15:18 28:25 29:3 32:21 45:9 64:21 64:23 65:2,3 85:21,22 112:21 phones 112:21 photograph 4:9 physically 73:20 picked 29:11 picture 97:20 102:21 103:21 piece 28:24 31:7 41:2,3,8 58:12 60:20 122:21 place 15:6,16 45:16 68:9 72:4,5 93:13 95:11,13 placed 21:16 82:23 102:12 placement 12:9 places 39:11 71:12 87:10 119:4 134:20 placing 105:9 plaintiff 1:6 5:10 plaintiffs 1:11,14 5:12,13 7:11,12 play 11:16 23:15 64:19 78:12 79:5 79:16,18 pleaded 119:4 please 6:8,20 7:17 7:22 8:2,6,10,14	16:11 19:2 20:20 23:16 26:16 27:10 28:21 30:8,15 32:13 34:24 56:5 62:21 71:14,16 75:6,11 83:16 106:13 126:3 plus 94:8 143:22 pneumothoraxes 21:12 point 25:20 60:14 122:25 pointed 125:12 pointing 119:20 polacks 44:5 poland 20:8 84:12 polish 44:5 45:21 popular 29:8 portal 143:22 portion 63:4 posed 7:25 position 86:22,25 107:17 positive 36:5 101:8,9 possible 93:13 pr 141:24 practice 17:25 prepared 41:24 42:8 59:18,22,24 60:16 146:3 presence 133:2 present 3:19 presentation 98:16 100:9 presentations 100:10,12 pressure 49:19 pretty 29:8 31:6 80:7 100:6	previous 107:21 previously 18:5 39:9 71:21,22 88:8 112:21 printed 25:11,15 printout 4:7 21:22 prior 24:13 46:4,7 46:15 92:10 145:4 privilege 62:5 privy 56:20 141:4 probably 12:20 38:11 42:6,10 45:12 50:13 59:21 60:14,23 66:22 74:13,19 83:8 87:9 92:7 98:23 99:2 103:11,16,22 103:23,24 107:9 113:3,25 114:9,13 114:18 118:12,22 120:12,14 122:21 122:23 131:16 140:24 141:12 143:7 problem 23:12 117:2 143:11 procedural 5:25 proceed 30:23 31:3 proceeding 5:4,23 144:13 146:4 proceedings 145:3 145:4,5,8 146:5 process 118:24 produced 5:22 83:4 119:23 126:22 129:6,8,10 professional 55:22 proffer 75:6,9,16 75:21 77:7
--	---	---	---

[programmers - recorded]

Page 16

programmers 107:19 117:12	13:18 16:5 18:9 18:13 20:4,6	r r 3:1 6:11 46:7	124:16,21 125:15
project 117:14 121:7,13 122:19 139:23,23	23:14,16,20 25:25 26:3 28:21 30:4 30:18 32:14,16	111:19 115:18,20 rachel 94:15,16 ran 90:7	127:19 128:3,4,6 received 112:10 112:13,17 124:23 126:8,14,20 127:2 127:23 128:7,21 129:2 140:23 141:2
projection 120:19	33:20 36:11,16,19	random 89:24,24	receiving 141:10
projects 81:6 122:20	36:23 37:10,12,18 38:12 43:22 44:12	reached 80:24	recognition 83:12
promote 78:23 138:12,13,18,24 139:12 141:15,19 141:25	46:12,17 47:7,7 48:10 50:13,15 54:11,14 57:9,10 58:9,11 60:3 62:10,12,15,16	read 20:11 24:6 27:2 32:9 61:15 61:19 63:4 113:22 114:3,4,4 115:7 120:22 143:13,15 143:17,18,19	recognize 18:2 22:21 83:5,7,9 102:22
promotes 142:12	63:17 65:12 68:12	reader 143:20	recollect 61:14 122:15 123:7
promoting 137:19 137:22 138:4 139:20	69:14 71:5,14,16 72:7,25 73:10 77:18 79:8 83:16 84:25 87:21 92:17 97:4,9 98:10 99:19 100:5,7 101:25 102:4 106:16 107:18 115:3,5,13 118:18 123:3,5 125:8,21 131:8,17 132:6 135:7	ready 8:17 122:25 real 89:5 94:14 109:17,18,20,22 110:4,5,19 111:7	recollecting 104:12,14 recollection 27:14 60:16 121:21 134:3
promotion 141:11		realized 133:7,8,8 really 10:4 14:2 19:10,11 20:9,10 20:20 32:7 38:19 47:8 51:10 52:7 52:11 61:13 67:17 80:4 81:21 95:24 108:9 113:7,22 119:11 120:3 134:12,22	recommendations 80:23 108:12
promotional 34:11		reason 7:21 19:5,8 92:22 97:17 107:18 140:6 147:6	record 5:4,7,19 6:9,22,25 7:3,4,6 7:23 8:9,17,20,22 11:19 28:12 34:24 34:25 35:6,7,10 37:13 38:19 39:18 39:20,22,23,25 40:2,4 51:25 52:3 62:23,25 63:3,10 87:24 88:2,4,6 116:19,21,22,24 126:17,17,19,20 137:11,12,13,15 137:17 144:10 145:9 146:5
proper 68:12		recall 26:11,12 44:25 45:16,23 55:12,13,14 87:7 87:14,16 91:10 101:3 103:2,8 111:4 113:14 140:4	record's 47:7 recorded 6:3 145:6
properly 37:12 68:12		receive 47:14,17 47:20,23 122:2	
provide 120:24			
provided 37:21 120:13			
providing 58:25			
pseudonym 118:5			
pta 124:5,8,9	questioned 114:25		
public 2:6 46:23 74:10,12 144:23 145:1,20 147:25	questioning 69:9 questions 7:13 8:2 30:22,22,25 33:6 33:10,12 35:16 51:10,15 52:5,10 52:12,16,21 54:15 76:4 77:14 81:14 114:12 116:11 117:20,21,22 123:2 124:11 135:16		
puffy 27:14	quite 52:8		
purpose 105:8			
put 29:9,20,22 38:18 41:18 54:7 57:17 61:10 93:22 96:8 98:15 100:8 134:6			
q			
qualified 145:7			
question 7:17,19 7:22,25 8:8,11			

[recording - satoshi]

Page 17

recording 5:22 8:4 145:8 146:3	20:9,10 23:20 25:22,23 26:22	8:18,21 21:3 23:24 24:3 34:25	rhyme 97:17
records 62:13 121:20 128:24 129:4 141:6	27:11,17 34:10 36:25 43:25,25 44:24 45:4,5,8,12	35:5,7 39:24 40:3 62:23 63:2,10 88:2,5 116:20,23	ridiculous 140:17
reduced 145:6	45:17,19 46:9	137:11,13,16	right 6:9 19:7 23:10 24:3 30:6,6 31:6 32:8 34:20 36:24 37:13,25 39:13 43:16 44:7 49:19 70:12 75:15 75:19 79:13 82:17 85:11 86:14 96:12 113:23 116:17 119:8 122:4,6 123:5,7 125:6,6 127:8 136:2 137:25 139:4
refer 35:10	47:13,16,19 48:2	143:21,25 144:3,9	road 67:20,24 68:6 147:2
referenced 45:14	48:15,16 49:9,17	represent 7:10	robert 1:9,13 3:20 5:11,13
referred 136:21	55:4 56:19 60:12	representation 25:14 41:4,21 77:7,9	role 10:12 11:16 26:9,11,12 47:3 64:19 78:12 79:4 79:16,18 86:17
referring 35:11,12 123:24 136:23	61:17,25 66:6,10 67:17 74:2,7,13,15 74:19 78:9 83:25 85:23,24,25 86:11 92:21 99:4,5,8,11 100:19,20 101:9 101:16 102:9 103:6,11 104:22 104:23,25 107:10 107:11 110:25 111:11 113:9,12 121:3,5,18,25 122:15 123:9,10 123:10 125:3 126:10,15,16 127:16 128:9,15 128:16,22,23	represented 98:13	roman 45:22
refers 136:18,24		representing 76:24 105:13	room 8:16
reflect 11:19 37:14		request 28:16 67:10,12,14,16	ross 90:9,10,10,10 90:10
reflects 52:4		requested 63:11 95:19 145:23	row 50:22
refresh 27:13 60:15 99:7 121:20		requirements 139:11	rules 6:2
regard 75:12		resell 138:7	run 12:12 122:24
regarding 45:11 80:15 115:13 131:12,23		reserved 144:11	running 65:24
regular 80:19		reside 49:10,12,14 68:14 71:23	runs 90:7
relate 52:10 83:14 83:19		resided 71:22 72:4	rvh 1:9,13 5:11,12 21:20,21 147:4
related 75:16 145:10 146:7		resides 108:16,18 108:24	s
relates 129:11		resolve 49:13	s 3:1 4:5 46:7 111:19 147:6
relating 60:25 65:9 80:10 99:16 103:15 133:2	remembering 25:5	resource 13:2	sat 98:21,23
relationship 10:14 53:19,23 54:21,22 55:6,8,9,10,12,21 56:16,16	remotely 6:8	respect 28:17	satoshi 74:21,23 74:24 75:25 76:2 76:25 77:10,20,21
relationships 53:8	rendered 129:14 129:18	respectfully 28:14	
relative 145:12 146:9	renov 22:20 115:18,20	respond 54:18 68:12 76:21 77:4 97:4	
remember 9:14,19 10:5,6,7 11:12,15 12:22 13:11,12,14 13:16,18,24 14:4 15:7,12,13 17:3,5	rent 95:11	response 8:3,5	
	rented 95:13	responsible 15:2	
	repeat 23:18	rest 133:18 134:6	
	rephrase 7:20	retained 4:11	
	replay 24:2	retinal 61:9,10	
	replayed 63:10	review 145:23	
	reported 2:6		
	reporter 5:2,3 6:13,20,23 7:2,5		

[satoshi - spanos]

Page 18

77:23 78:4 88:9 88:11,13,18,23,24 89:3,7,23,23 90:12 91:3,12,17,24 92:11 93:21,23,25 94:8,12,18 95:5 96:11 118:5 saw 18:16 44:3 110:10,12 saying 19:4 25:12 28:18 30:7 33:7 37:17 41:7 70:11 70:18 89:22 91:13 93:16,17,18,19 94:21 102:10 104:19 106:22 117:23 120:6 123:16,20 131:16 135:9 136:2 says 11:20 22:3 24:11 50:21 58:10 83:24 84:2 85:7 85:11 87:9 94:22 107:22 136:25 schedule 106:3,5 scratch 53:2 screen 120:19 screw 18:23 screwed 133:9 sean 22:18 25:20 27:5,14 search 113:4,6,8 113:10 second 8:19 16:11 37:11 39:19 124:19,19 see 22:3,7 58:6 61:8,13 62:13 102:20 110:13 113:5 118:9 119:12 120:4,17	120:18 135:15 seen 21:23,24 109:13,17 117:19 119:11 self 18:24,25 19:9 send 33:25,25 114:19,20 sent 61:16 95:18 95:20 96:6 113:23 122:6 139:15 sentence 22:12 separate 35:14,15 seriously 8:12,13 8:15 services 36:4,8 37:5,21 38:2,2,15 40:11 48:3,4,14,19 48:24 49:3,4 50:2 50:19,24 58:25 66:15,20,24 67:9 71:25 72:13,17,19 72:22 73:5,8,12,18 73:25 74:4 87:15 120:13,25 129:14 129:17 seventy 104:16,18 shareholder 87:3 shares 109:21 111:8 134:8 sheet 147:1 shoulders 28:13 show 89:5 94:2 104:6 122:11 showed 119:10 showing 82:15 shrugging 28:13 shut 131:6 shuttle 45:5 siegel 94:15,16 sign 143:12,16,17	signature 144:11 145:17 146:14 simon 50:21 simple 134:25 sit 50:6 105:22 120:19 site 25:6 29:20,22 29:23 42:18 sitting 122:18 six 94:6 skills 145:9 146:6 slept 109:3 slide 98:16 104:6 slides 98:16,17 100:8,9 101:10,13 102:6,7 slideshow 101:14 slow 75:6 smart 30:17 108:11 117:23,24 software 67:6,7 80:23 123:19,20 124:18 125:11,16 127:7 138:6,13 solutions 147:1 somebody 106:2 someone's 45:9 142:22 sorry 10:16 13:4 16:12,12,24 18:10 21:11 22:7,10 24:25 26:18 32:15 32:17 40:15 46:13 48:8,11,23 50:16 50:16 56:5 57:20 59:8 66:12 83:18 85:2,13 89:16 91:22 92:18 93:19 97:5 99:20 102:14 110:2 111:17 118:19,19 123:8	124:12 125:9 126:6 127:5 132:7 136:3,7 139:8 sounds 115:21 116:3,3 source 117:14 141:9 southern 1:2 sown 144:18 space 45:5 46:23 spanos 1:16,16,21 3:10 5:1,9,14,14 6:1,10,16,22 7:1,9 8:1,24 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1,7 21:1,6,7,16 21:17 22:1 23:1 23:10 24:1 25:1 26:1 27:1,22 28:1 28:14,17 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1,9 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1,4 53:1 54:1,17 55:1 56:1 57:1 58:1 59:1 60:1 61:1 62:1,12 63:1 64:1 65:1 66:1 67:1 68:1,9 68:14 69:1 70:1 71:1 72:1 73:1,4 74:1 75:1 76:1 77:1 78:1 79:1 80:1 81:1,17,18,24 82:1,11,23 83:1
--	--	--	---

[spanos - sure]

Page 19

84:1 85:1 86:1 87:1 88:1,8 89:1 90:1 91:1 92:1 93:1 94:1 95:1 96:1 97:1 98:1 99:1 100:1 101:1 101:18 102:1,12 102:19 103:1 104:1 105:1 106:1 107:1 108:1 109:1 110:1 111:1 112:1 112:20 113:1 114:1 115:1 116:1 117:1,4 118:1 119:1,19,20 120:1 121:1 122:1 123:1 124:1 125:1 126:1 126:23 127:1,10 128:1,2 129:1 130:1,5 131:1 132:1 133:1 134:1 135:1 136:1 137:1 138:1 139:1 140:1 141:1 142:1 143:1 144:1,16 147:4,21 sparking 123:7 speak 76:19 88:13 88:23 89:7 speaking 45:19 specific 52:13 75:17 129:25 138:11 specifics 52:7 speculate 96:24 128:12 speculation 65:13 speed 81:10 spell 13:25 spend 67:18,21 68:2	spleen 21:10 spoke 56:23 spoken 88:11,18 spokesperson 79:20,23 80:4 sponsor 92:13 95:9,10 sponsored 91:18 91:25 92:3 93:7 95:6 98:6 sponsoring 93:21 95:8 97:24 sponsors 95:11 sporadically 31:24 31:25 square 74:21,23 74:24 76:2,3,25 77:10,21,23 78:4 88:9,11,14,18,23 88:24 89:3,8,23,23 90:4,12,20 91:4,13 91:17,25 92:11 93:21,23,25 94:8 94:12,18 95:5 96:11 97:11 st 106:11,14,15 107:4,7,24 108:6 108:13,16,20 109:5,11 110:13 110:21 111:13 115:9,10 stamped 21:21 82:24 standing 122:18 standpoint 56:9 56:10 stare 72:25 start 8:17 13:7 53:2 62:11 118:24 started 90:20 118:25	state 7:22 108:18 145:21 states 1:1 station 122:23 statue 90:3,4 stenographer 8:4 stenographic 6:4 step 76:20 steve 46:7,15 47:11,14 111:16 111:19 112:4,6,10 112:14,17,25 113:5,20 stipulation 6:5 stole 135:12 stood 98:19,22,23 stop 16:11 34:9 75:6,10 127:4,21 135:23,25 stopped 102:8 straight 8:9 straightforward 54:15 stray 82:6 street 2:4 3:5 5:17 71:19 82:18 90:25 91:5 106:25 109:24 116:7 strike 16:24 41:7 53:3 54:21 55:5 58:25 71:22 structure 81:4 124:14 stuff 17:21 56:4 57:17 92:23 95:12 113:13 121:22,23 121:24 134:7 135:2,4 138:8 139:10 subcontractors 122:3,3	subscribed 144:18 147:22 substance 51:10 sudden 105:23 sue 133:15 suggest 76:23 suggesting 82:5 suggestion 76:22 suggestions 79:25 108:11 sullivan 3:12 sullivanlaw.com 3:15 supplement 133:18 suppose 106:9 supposed 74:18 133:5 sure 10:18 11:25 19:9 34:17 39:13 39:15 40:25 41:4 41:11,14,15 43:4 43:10 44:24 50:5 50:9 52:8,11 55:11 57:23,25 58:16 61:22 64:14 73:22 84:7,17 86:7,11 87:3,10 88:12 89:2 94:25 95:7 96:9,16 103:22 104:4,4,23 104:25 107:9 108:15,24 113:21 114:18 115:12,14 115:24 116:5,13 121:25 126:24 129:10 135:16 136:11,17 138:14 138:16 139:2,2,16 140:10 141:2 142:19 143:4,5,5
--	--	--	--

[surgeries - think]

Page 20

surgeries 22:8 32:6 61:9,11 114:6 surprised 76:23 swear 6:14 switzerland 31:13 61:4 sworn 5:20 6:17 145:5 147:22 synapse 1:17 5:14 9:10,11 10:8,22,25 11:9,11 13:10,21 14:11,19 15:3,16 16:3,14,17,20,24 24:17,20 25:21 27:15 31:17,23 32:2,20 35:11,22 36:4,8 37:5 40:24 41:24 42:7 43:5 48:19,24 49:6,7 50:3,7,20 51:3 53:24 55:8,16 56:9,17 57:5,13 58:19,22,25 59:15 59:19 60:6,17 61:2,7 64:2,3,7,8 64:16,20 65:7,10 65:17,19,24 66:15 66:21 72:2,14 73:5,9,13 74:5 77:11 78:2,14,16 78:17,19 79:10,19 80:11,14 82:25 84:9,19 86:3,6,13 86:15 87:14 99:25 107:25 108:7,14 115:23 119:3,16 119:17 120:10,25 121:7,13,17 122:13 123:13 127:9 130:7	131:24 133:23 135:5 136:15,20 136:25 137:2 138:12,21 142:7,9 142:11,12 t t 4:5 tabby 66:7 tabitha 66:7,8 take 5:4,5 7:15 8:4 8:12,15 12:2,3,5 28:16 29:16 63:6 79:12 97:17 116:9 133:13 taken 5:9 8:13 14:22 25:10 145:3 145:11 146:8 talk 22:9 56:11 76:8 77:25 115:9 116:10 137:7 talking 27:12 38:7 56:15 76:9,12 96:21 113:22 123:11 142:24 talks 124:4 team 22:15,15 24:12,12 67:22 technical 107:25 108:3,6 technologies 1:4 5:9 47:18,21,24 48:14 53:23 54:22 70:5,8,14,17,21,25 71:7,13,24 83:2 84:21 86:3,7,16,17 86:19,21,23 118:13,23 119:2,5 119:6,16,18 120:11,24 121:6,8 121:10,15,16,24 122:10,11 124:24	125:5 126:14 127:11,19 128:18 128:20,25 129:19 147:4 technologist 87:13 technology 70:19 80:2,2,7,9 100:10 105:11,14,21 106:7,8,15 117:4 118:25 137:20,23 137:24 138:4,13 138:19,24 139:13 139:21 141:11,15 141:20,25 142:13 telephone 32:12 tell 6:18 7:17 26:21 28:8 37:23 68:10 71:3 75:22 103:6 106:13 114:19 118:11 122:12 telling 133:12 tells 76:3 term 18:19 terms 51:15 52:6 52:13 testified 6:19 39:9 127:10 128:3 testifying 145:5 testimony 15:21 16:7,9 18:5 27:7 59:10 72:19,21 112:13,16 textbook 87:10 thank 6:13 48:23 77:5,16 82:13,13 82:19 101:16 116:17,25,25 thanks 106:19 that'd 59:23	theoretically 139:9 thing 20:23 38:2 90:15 93:14 94:5 96:23 113:7 119:12 120:18 135:6 140:22 things 8:14 29:10 34:3,6,8,10,14 67:3 80:18 81:10 114:13 119:5 121:17 122:9,16 122:17,17 123:8 134:7,10,17,21 think 10:10,10,10 10:11 12:4,4 14:21 16:5,7 17:24 18:16 23:6 23:19 27:11 28:22 28:22 34:4,9,10 35:13 40:13 43:3 43:12,15 45:21 47:22,22 48:5,15 49:2 51:10 52:9 56:18,22 57:18 60:21 62:4 66:12 67:13 68:25 69:11 71:19 73:23 74:7 74:17,18 78:5 79:21 80:18,19,19 81:2,9 83:15,15 87:12,18 88:22 90:3 91:6 92:9,12 95:8 96:10,12 100:17 103:18 106:24 108:2,5,15 111:11 112:2 113:3,11,11 116:5 117:8 119:11,15 119:15 125:3 126:15 128:10
---	---	---	--

[think - understand]

Page 21

129:19 131:25 133:7,8 137:4 139:17 140:3,20 141:13,23 142:15 142:16,17,19 thinking 27:16 108:19 136:12 thinks 89:22,23 third 1:14,19 5:13 5:15 7:11 14:8 87:17 thought 52:10 71:15 104:14 thousands 80:25 80:25 81:5 three 42:25 54:8 73:20,21 82:23 83:6,14,19 96:13 98:17 101:13 120:7 123:10,11 threw 92:24 93:10 throws 92:23 thumb 134:14 thursday 107:13 tickets 95:22,23 time 1:23 2:2 6:7 7:3,6 8:19,22 11:9 13:8,20 14:14,18 16:15 25:4,20 26:5 29:13 33:18 35:2,8,20 39:25 40:4 42:13 43:3 44:3 45:20,24 53:15,17 56:5 62:24 63:3,5,6 64:22,23 65:6 66:9,11,13,18 67:19 68:3,5,9 73:19 79:12 80:6 86:15,22 87:8 88:3,6 96:2,11,22	103:17 105:4 106:25 107:3 116:21,24 120:23 120:24 122:14 126:4 133:24 137:14,17 138:21 141:5 144:10 timeline 84:17 138:20 times 8:7 43:15,17 50:22 92:13 96:11 96:13,14 103:19 103:23 104:4,4,15 105:20 107:9 110:24 tired 98:21 title 25:23 57:12 57:21 58:5 titles 17:20 47:11 108:9 124:8 toastmasters 94:9 94:9,10,11 today 50:6 79:19 token 123:18,19 124:17 129:2 tokens 125:15,18 125:24 126:14,21 127:2,12,20,24 128:21 139:20 140:2,7,9,23 141:3 141:7,11 143:3 told 34:9,10 43:8,9 43:14 65:21 66:3 112:21 120:17 134:7 tom 106:11,13,15 107:2,4,7,16,24 108:6,13,16,20 109:5,11 110:21 111:13 115:9,10	tool 34:11 top 134:12 143:8 totally 27:25,25 52:22 76:22 trade 74:25 77:24 89:6 90:2 traded 90:6 traders 90:2 tradeshow 98:20 99:13,15,22 104:3 104:24 105:9 tradeshows 98:14 99:11 103:14,20 103:24 104:9 105:10 141:15 train 94:12 transcribed 32:25 33:3 transcriber 146:1 transcript 5:22 143:16,21 145:23 146:3,4 transcriptionist 145:7 triple 54:7 true 28:7 52:2 145:8 146:4 trust 82:9 120:18 truth 6:18,18,19 try 7:19 8:15 22:9 93:11 97:18 120:22 133:14,15 trying 27:17,20 28:2,22 43:15,21 43:24,25 44:2 50:17 52:4,18 69:15 71:4 81:3,3 94:13 97:11,19 114:12 123:21 124:12 126:6 131:9 133:13	turn 21:25 22:5 24:11 turning 23:8 87:17 tutor 135:18 tv 120:19 tweet 34:3,5,8,14 34:20,21 74:18 tweeting 34:9 66:25 tweets 98:11 twice 96:12 twitter 33:15,16 33:21,21,22 two 14:5,5,7 22:4 35:16 50:22 66:6 87:18 95:8 98:17 101:13,21 102:6 116:9 143:22 type 27:15 38:15 86:5 93:6 117:25 types 81:5 86:9 typewriting 145:6 u u.s. 119:9 ucc 134:6 unanswered 114:2 114:3,16 115:10 115:15 uncompensated 38:8,10,15 40:11 66:15,20 undefined 52:5 understand 5:21 7:17,18,19 18:11 19:11 20:4 38:11 50:25 52:5 54:4 67:2 73:10 80:18 80:21 81:2,9 93:14 97:6,20 117:10 119:12 129:16 136:8
---	---	--	--

understanding 16:9 83:13	89:13 93:3 124:19 124:19 130:22,22	123:23 124:14 133:16,20	48:11 50:16 51:8 54:6,10,16 56:3,18
understands 72:8	130:22 132:15,15	ways 134:19	57:11,14,20,23,25
understood 117:22	132:15,15,16	we've 63:8 126:22 129:3	58:6,10,13,16 60:2 62:18,21 63:5,8,16
union 90:3,19	walk 46:25	webpage 11:20	64:14 65:21 69:6
united 1:1	walked 8:16 46:25 47:2,4 53:4,6,11	website 4:7 20:24 21:22 23:5 25:16	69:11,15 71:18 72:10 73:2,15
unpaid 46:18,22 48:4,13,16,18,24 49:3 50:4,20 73:15 105:13	53:14	41:4,16,24 42:8,15 42:19 45:11 59:23 107:23 131:2,15	75:4 77:17 78:8 79:11,13 81:13,16 81:20 82:2,6,17,21
unread 115:15	walking 133:11	websites 29:10	85:2,11,14 89:15 90:6 91:22 92:18
use 32:7 33:15,16 33:21,22 96:23	walks 118:10	weird 20:9,12	93:5 97:2,5,10 98:11 99:20 100:6
uses 5:24	wall 2:4 3:5 5:17 53:5,7 71:19 82:18 106:24 109:24 116:7	went 29:20 41:19 44:9 113:12 134:9 139:17	100:19,22,25 101:4,7 102:3,9 103:10 104:18,21 105:17 110:8
usually 80:5 106:2	wallet 139:19	we're 7:5	111:20 112:19 115:2,6 116:14,17 116:25 118:19
utility 123:19 124:17 125:11,16 127:7	wallets 141:8	what'd 130:22	124:12 125:9,22 126:5 127:3,5,13 127:16 128:9,13
uveitis 61:10	want 6:22 7:18 18:23 19:6 21:3 29:25 33:12 34:12 34:21 36:15 37:12 38:18 39:21,22 41:5 56:25 57:17 61:20 62:11 63:14 71:3 79:13 81:7 87:20 97:6 101:24 102:3,5 106:21 128:6,11 137:9 138:6,7 140:12,20 143:9	whatsoever 49:5 64:19 108:10	128:16 131:6,9,20 132:7,19 133:4 134:19 135:9,12 135:21 136:2 140:14,17 143:20 145:4
v	wanted 29:2,7 63:13 85:16 133:17,17,18	white 114:7	witnessed 95:2,4
v 115:18,20 147:4	wallets 141:8	whoever's 34:17	won 50:22
various 8:6 103:19 141:7	wants 30:2 31:10 122:21,23,24 126:5	wire 87:15	wondering 135:19
vasculitis 61:10	way 35:21,24 41:10 59:4 63:20 66:12 76:8,10,13 81:5,6 82:11 92:22 103:18 115:23 116:2	wished 27:12	worcester 3:12
verbal 8:2,5		witness 5:20,21 6:10,14,17 9:14 10:19 13:15,17 15:24 16:12 17:15 18:15 19:4 21:9 21:12 22:10,13 23:13,21 25:2,4,17 26:2,19 28:2 29:24 30:6,12,16 31:12 32:17 33:7 33:11 35:3 36:13 36:15,18,21,24 37:11,14,17,25 38:10 39:18,21 43:12,20,24 44:14 44:17 46:13 48:8	word 12:10 49:4 95:9,10 123:20
veritext 5:4 147:1			work 36:3 38:4,12 38:13,25 39:5 49:16 50:3 69:2,2 74:17 81:5,6 84:3
victim 135:4			
village 29:15			
visible 79:23			
visited 109:11			
visitor 46:21,23			
volunteer 38:16 38:17			
w			
w 69:4			
wait 7:22 8:10 25:13,13 43:18 51:5 71:8 75:5,5,5 75:5 79:7,7 82:19			

[work - zap.org.]

Page 23

84:5 85:4,5,10,12 85:16 86:2,5,7,8 86:11,13,16,21 109:9 117:11 119:18 124:14 133:20 worked 41:22 48:15 72:5 110:14 110:17 121:7,13 121:17,21 working 25:21 41:16 works 81:2 world 31:6 49:6 50:3 51:2 73:20 73:21 80:5 94:8 94:14 97:11 99:2 100:15 102:25 105:7,7 114:2,2 134:13 worry 82:12 worse 61:9 worth 142:23 143:3 wow 22:13 36:24 82:21 write 36:9 37:7 132:20 140:15,19 140:21 writing 33:3 37:14 written 6:5 118:7 wrong 16:8,10 120:18 wrote 140:22 143:2	y y 33:25 70:18 yeah 9:22 11:8 12:16 14:7,7,12,17 14:21,21 18:8,10 18:21 19:15,18 20:25 22:3,4,17,17 22:17 25:9 26:8 29:5,24 37:9 38:10,11,16 39:11 41:5 44:18 45:15 48:16,17 51:8 54:16 55:13 59:17 67:10 68:2 71:18 72:3 73:7,15 74:22 77:22 78:8 82:17 83:3,8,11,15 84:20 86:4 88:10 91:2,2,6,9,16 94:23 95:12 96:21 97:2,2 98:2,14,15 99:4,4 100:17 101:10 102:16,23 103:10 104:11 105:18 106:12 107:6 109:15 110:8,16 111:23 112:8,19 115:7 118:15,22 121:12 122:6 125:6 127:3 131:2 132:19 137:21 138:5,16 138:23 140:3 141:4,22 142:6,10 143:17,24 year 10:5 69:18,19 73:22 88:16 91:14 99:11 years 9:17 45:17 50:22 53:4 56:24 94:6 116:4 123:10	123:11,12 133:7 133:10,19 york 1:2 2:5 3:6 3:14 5:6,17,17 15:11 38:23,25 39:14 40:7,12 67:23,24 68:6,15 68:16 71:23,24 72:5,16 77:3 90:20 99:3,16,23 100:16,21,23 101:6,10,15 103:3 103:4,9,15,20,24 104:9,22 107:5 108:21,22 110:22 111:10 129:18 130:6,10,14,18,25 131:12,18,23 132:3 133:3 145:21 147:2 young 17:7,7 20:13,14 46:2,4,6 47:20 49:24 50:9 50:11 53:2,3,8 54:20,23,23 55:2,6 55:6,14 56:7,16,19 56:22 57:4,7,21 58:18 114:17 139:25 140:2,7 yugoslavia 84:13 84:13	143:3 zap's 92:24 zap.org 1:18 4:7 5:15 8:25 9:3,5,7 9:12 10:12,15 11:14,17,23 12:5 12:10,15,18,24 13:9,20 14:14,18 14:19 15:3,17,22 16:6,15,18,20 17:8 17:10,13 18:3 20:7,24 21:22 22:24 23:5 24:5,9 25:6,16 31:5 35:11,25 37:22 38:6 42:9 53:24 57:7,15,22 58:15 58:19 76:25 77:3 77:10 78:3,13,19 91:25 92:10,13 93:21 95:5,13,17 95:18 97:24 98:6 98:13 99:23 100:8 102:22,24 103:3,9 103:17,19,21 108:4 116:2 117:5 118:16 129:11 130:11,15,19 131:2,13 133:2,23 135:4 137:20,23 138:13,19,25 139:13,21 141:11 141:15,19,20 142:2,13 zap.org's 93:22 zap.org 7:16 10:20 11:21 16:25 18:6 75:13 118:21 130:23 131:19 132:16,18
x		z	
x 4:1,5 33:25 145:23		z 33:25 zap 14:16,17 15:24 16:3 22:15 24:11 24:12,14 71:15 75:7 78:16 91:18 98:18,19,21,22,24 99:3 101:14 104:6 104:8,10,21 105:9 105:12 139:14	

[zaterman - zero]

Page 24

zaterman 22:20
zero 114:8

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate.

The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.